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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

SEMICONDUCTOR ENERGY
LABORATORY COMPANY, LTD.,

Plaintiff,

v.

ACER INCORPORATED, ACER
AMERICA CORPORATION, and
AU OPTRONICS CORPORATION,

Defendants.

CASE NO. C 02-02800 WHA

JOINT CLAIM CONSTRUCTION
AND PREHEARING
STATEMENT

Pursuant to Patent L.R. 4-3, Plaintiff Semiconductor Energy Laboratory
Company, Ltd. ("SEL") and Defendants Acer Incorporated, Acer America Corporation

1
2 (collectively "Acer") and AU Optronics Corporation ("AU"), through their respective counsel,
3 hereby jointly submit the following "Joint Claim Construction and Prehearing Statement."

4 **1. Agreed Claim Constructions (L.R. 4-3(a))**

5 The parties' counsel have met and conferred but the parties do not agree on the
6 construction of any disputed claim terms, phrases or clauses. The parties also do not agree on
7 which terms should be construed for the Claim Construction Hearing set for April 9, 2003.

8 **2. Anticipated Length of Claim Construction Hearing (L.R. 4-3(c))**

9 The parties agree that the anticipated time necessary for the Claim Construction
10 Hearing is one day.

11 **3. Proposed Constructions and Identification of Evidence, Witnesses and Other Issues**
12 **(L.R. 4-3(b),(d) and (e))**

13 **A.SEL's Proposed Constructions and Identification of Evidence, Witnesses and Other**
14 **Issues (L.R. 4-3(b),(d) and (e))**

15 SEL proposed that the claim phrase "wherein said conductive adhesive extends
16 lengthwise beyond each end of the first and second electrodes" and the claim phrase "each end
17 of said first electrode and said second electrode is completely covered by said resin in a
18 lengthwise direction" from U.S. Patent No. 6,404,476 be construed. The Defendants proposed
19 that five additional claim terms or phrases from the patents in suit be construed. Pursuant to
20 Patent Local Rule 4-3(b), SEL's proposed claim constructions for the terms and phrases
21 proposed by all parties are given below for each patent. Following each construction, the
22 intrinsic evidence and extrinsic evidence in support of SEL's construction or in opposition to
23 Defendants' constructions is identified per Patent Local Rule 4-3(d). Finally, other issues
24 relevant to the Claim Construction Hearing are raised pursuant to Patent Local Rule 4-3(e).

1
2 **U.S. Patent No. 6,404,476 (the "476 patent")**

3 (1) The phrase **"wherein said conductive adhesive extends lengthwise beyond**
4 **each end of the first and second electrodes"** should be construed to mean: wherein said
5 conductive adhesive extends lengthwise beyond an end of the first electrode and an end of the
6 second electrode.

7 In addition to intrinsic evidence, including the intrinsic evidence listed in
8 attached Exhibit A, SEL may rely on the testimony of Paul Kohl, Ph.D., who will testify that
9 SEL's proposed claim construction, as viewed by one of ordinary skill in the art, is in
10 accordance with the intrinsic evidence, including the specification and prosecution history of the
11 '476 patent and any related applications, and any references cited therein. Dr. Kohl will also
12 testify that Defendants' proposed claim constructions, as viewed by one of ordinary skill in the
13 art, are not in accordance with the intrinsic evidence. Dr. Kohl's curriculum vitae is attached in
14 Exhibit B.

15 (2) The phrase **"each end of said first electrode and said second electrode is**
16 **completely covered by said resin in a lengthwise direction"** should be construed to mean: an
17 end of said first electrode and an end of said second electrode is completely covered by said
18 resin in a lengthwise direction.

19 In addition to intrinsic evidence, including the intrinsic evidence listed in
20 attached Exhibit A, SEL may rely on the testimony of Paul Kohl, Ph.D., who will testify that
21 SEL's proposed claim construction, as viewed by one of ordinary skill in the art, is in
22 accordance with the intrinsic evidence, including the specification and prosecution history of the
23 '476 patent and any related applications, and any references cited therein. Dr. Kohl will also
24 testify that Defendants' proposed claim constructions, as viewed by one of ordinary skill in the
25 art, are not in accordance with the intrinsic evidence.

1
2 U.S. Patent No. 6,355,941 (the "941 patent")

3 (1) The phrase "**non-single crystal semiconductor**" should be construed to mean: a
4 semi-amorphous semiconductor, an amorphous semiconductor or a mixture thereof.

5 In addition to intrinsic evidence, including the intrinsic evidence listed in Exhibit
6 A, SEL may rely on testimony of Rafael Reif, Ph.D., who will testify that SEL's proposed claim
7 construction, as viewed by one of ordinary skill in the art, is in accordance with the intrinsic
8 evidence, including the specification and prosecution history of the '941 patent and any related
9 applications, and any references cited therein. Dr. Reif will also testify that the Defendants'
10 proposed claim constructions, as viewed by one of ordinary skill in the art, are not in accordance
11 with the intrinsic evidence. Dr. Reif's curriculum vitae is attached in Exhibit B.

12 (2) The term "**intrinsic**" should be construed to mean: not intentionally doped with
13 an efficient dopant.

14 In addition to intrinsic evidence, including the intrinsic evidence listed in Exhibit
15 A, SEL may rely on testimony of Rafael Reif, Ph.D., who will testify that SEL's proposed claim
16 construction, as viewed by one of ordinary skill in the art, is in accordance with the intrinsic
17 evidence, including the specification and prosecution history of the '941 patent and any related
18 applications, and any references cited therein, and that SEL's proposed claim construction, as
19 viewed by one of ordinary skill in the art, is supported by the extrinsic evidence, including the
20 extrinsic evidence cited in Exhibit A. Dr. Reif will also testify that the Defendants' proposed
21 claim constructions, as viewed by one of ordinary skill in the art, are not in accordance with the
22 intrinsic and extrinsic evidence.

23 (3) The phrase "**channel region (or channel forming region)**" should be
24 construed to mean: an area extending from the source to drain, including but not limited to, the
25 channel.

26 In addition to intrinsic evidence, including the intrinsic evidence cited in Exhibit
27 A, SEL may rely on testimony of Rafael Reif, Ph.D., who will testify that SEL's proposed claim
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2 construction, as viewed by one of ordinary skill in the art, is in accordance with the intrinsic
3 evidence, including the specification and prosecution history of the '941 patent and any related
4 applications, and any references cited therein. Dr. Reif will also testify that the Defendants'
5 proposed claim constructions, as viewed by one of ordinary skill in the art, are not in accordance
6 with the intrinsic evidence.

7
8 **U.S. Patent No. 6,404,480 (the "480 patent")**

9 (1) The phrase "second interlayer insulating film having at least two openings"
10 should be construed to mean: the second interlayer insulating film has at least two openings, as
11 shown, for example in Figs. 1, 2A, 5F, 5G and 6-11 of the '480 patent.

12 In addition to intrinsic evidence, SEL may rely on the testimony of Paul Kohl,
13 Ph.D., who will testify that SEL's proposed claim construction, as viewed by one of ordinary
14 skill in the art, is in accordance with the intrinsic evidence, including the specification and
15 prosecution history of the '480 patent and any related applications, and any references cited
16 therein. Dr. Kohl will also testify that Defendants' proposed claim constructions, as viewed by
17 one of ordinary skill in the art, are not in accordance with the intrinsic evidence.

18
19 **U.S. Patent No. 5,929,527 (the "527 patent")**

20 (1) The phrase "the film made of aluminum or a material containing aluminum as a
21 principal component contains oxygen atoms at a concentration of 8×10^{18} atoms \cdot cm $^{-3}$ or less,
22 carbon atoms at a concentration of 5×10^{18} atoms \cdot cm $^{-3}$ or less, and nitrogen atoms at a
23 concentration of 7×10^{17} atoms \cdot cm $^{-3}$ or less" is readily understood and the terms therein should
24 be accorded their plain meaning.

25 The Defendants proposed claim constructions are not in accordance with the
26 plain meaning of the claim terms, as viewed by one of ordinary skill in the art. The intrinsic
27 evidence, including the intrinsic evidence cited in Exhibit A, the specification and prosecution
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2 history of the '527 patent and any related applications, and any references cited therein supports
3 SEL's proposed construction. The Defendants have not identified any extrinsic evidence in
4 support of their proposed claim constructions and SEL reserves the right to rebut any extrinsic
5 evidence identified by Defendants with extrinsic evidence, including expert testimony.

6 **Other Claim Construction Issues**

7 The parties have a dispute as to what should be disclosed in this Joint Claim
8 Construction Statement. Consistent with Patent L.R. 4-3, in this Joint Statement, SEL has
9 attempted to identify all intrinsic and extrinsic evidence it may rely upon in support of its
10 proposed claim constructions. Defendant AU Optronics has advised SEL that it is reserving its
11 rights to offer extrinsic evidence that it has not yet identified until such time as the Court has
12 ruled on the admissibility of extrinsic evidence. SEL has objected to this approach, and instead
13 interprets Patent L.R. 4-3 to require the parties to disclose any evidence that they may use as
14 part of the claim construction process. Defendants Acer have advised SEL that they are
15 reserving their rights to offer extrinsic evidence only in rebuttal. Although AU Optronics
16 asserts that the Court should review only intrinsic evidence, if the Court decides to review
17 extrinsic evidence for any purpose, including any expert testimony, that extrinsic evidence
18 should be identified now, not at the claim construction hearing. Otherwise, SEL's ability to
19 complete claim construction discovery prior to the claim construction hearing would be
20 frustrated.

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3 **B. Acer's Proposed Constructions and Identification of Evidence, Witnesses and Other**
4 **Issues (L.R. 4-3(b),(d) and (e))**

5 Acer reserves the right, pursuant to Patent L.R. 4-3(b), to rely upon additional
6 intrinsic evidence, including but not limited to portions of the prosecution history of the Patents-
7 in-Suit and related patents, to oppose SEL's proposed constructions of disputed claim terms.

8 **U.S. PATENT NO. 6,355,941**

9 **Claim Term**

Proposed Construction

Support

10 Non-single crystal
11 semiconductor

The term "non-single crystal semiconductor" means "semiconductor material having lattice strain."

Col. I, lines 23-29; Col. 7, lines 25-28; Col. 8, lines 25-30; May 3, 1991 Third Preliminary Amendment, pp. 4-6; December 12, 1991 Amendment, pp. 8-II and Appx. I-II; March 5, 1992 Office Action, p. 3; January 8, 1993 Preliminary Amendment, pp. 4-6; January 26, 1993 Declaration, pp. 1-9; August 13, 1993 Supplemental Preliminary Response, pp. 2-4; July 14, 1994 Office Action, p. 2

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20 Intrinsic

The term "intrinsic" means that the non-single crystal semiconductor material has the charge-carrier concentration of a pure, ideal crystal of that material.

"A semiconductor whose charge-carrier concentration is substantially the same as that of the ideal crystal." *IEEE Standard Dictionary of Electrical and Electronics Terms*, Sixth Edition.

Col. 8, lines 3-8; May 3, 1991 Third Preliminary Amendment, p. 8; December 2, 1994 Amendment, pp. 8-9

Channel region

The term "channel region" means "a semiconductor layer connecting and conducting current between the drain region and the source region."

"A surface layer of carriers connecting source and drain in an insulated-gate field-effect transistor." *IEEE Standard Dictionary of Electrical and Electronics Terms*, Sixth Edition.

Col. II, lines 39-45; Fig. 6H

U.S. PATENT NO. 6,404,480

Claim Term

Second interlayer insulating film having at least two openings

Proposed Construction

The term "at least two openings" means "two holes in the contact structure located in the common contact portion."

Support

Abstract; Field of Invention; Summary of Invention; Fig. 1, & 5-8; col. 5, line 46 to col. 6, 42; Fig. 1; col. 9, line 60-67; col. 10, lines 24-49.

U.S. PATENT NO. 5,929,527

Claim Term

The film made of aluminum or a material containing aluminum as a principal component contains oxygen atoms at a concentration of 8×10^{18} atoms/cm³ or less, carbon atoms at a concentration of 5×10^{18} atoms/cm³ or less, and nitrogen atoms at a concentration of 7×10^{17} atoms/cm³ or less

Proposed Construction

This phrase means "the maximum concentration of oxygen cannot exceed 8×10^{18} atoms/cm³ at any point in the thin film containing aluminum as a principal component, the maximum concentration of carbon cannot exceed 5×10^{18} atoms/cm³ at any point in the thin film containing aluminum as a principal component, and the maximum concentration of nitrogen cannot exceed 7×10^{17} atoms/cm³ at any point in the thin film containing aluminum as a principal component."

Support

Col. 7, line 30 to col. 8, line 11.

U.S. PATENT NO. 6,404,476

Claim Term

Wherein said conductive adhesive extends lengthwise beyond each end of the first and second electrodes

Each end of said first electrode and said second electrode is completely covered by said resin in a lengthwise direction

Proposed Construction

The term "first electrode" means "an electrode strip formed on the first substrate for conducting electrical current" and the term "second electrode" means "an electrode strip contained in the circuit for supplying driving signals."

The term "first electrode" means "an electrode strip formed on the first substrate for conducting electrical current" and the term "second electrode" means "an electrode strip contained in the circuit for supplying driving signals."

Support

Fig. 1, 2, & 3. Col. 2, line 57 to col. 4, line 43.

Fig. 1, 2, & 3. Col. 2, line 57 to col. 4, line 43.

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3 **C.AU's Proposed Constructions and Identification of Evidence, Witnesses and Other**
4 **Issues (L.R. 4-3(b),(d) and (e))**

5 AU Optronics presents the following Proposed Construction and Identification of
6 Evidence pursuant to the requirements of the Court's September 11, 2002 Case Management
7 Order limiting the number of terms to be construed at the claim-construction hearing. AU
8 Optronics reserves the right to seek, and will seek, construction of additional claim terms and
9 phrases at trial, or at another time, as directed by the Court. AU Optronics' submission is based
10 upon information currently available to AU Optronics. As additional information becomes
11 available through discovery, AU Optronics reserves the right to amend and/or supplement its
12 Proposed Constructions and Identification of Evidence, Witnesses and Other Issues. AU
13 Optronics further reserves the right to amend and/or supplement its position on claim
14 construction once AU Optronics has had the opportunity to review any future finding or order
15 from the Court related to construction of claim-terms.
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17 **I. U.S. PATENT NO. 6,355,941**

18 AU Optronics identifies the following phrase in asserted independent claims 3, 6, 10, 11,
19 12, 13, 14, 15, 16, 20 and 21 of U.S. Patent No. 6,355,941 ("the '941 patent") for which it
20 contends that construction by the Court is necessary:
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22 *"... non-single crystal semiconductor ..."*
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24 AU Optronics contends that the phrase "*non-single crystal semiconductor*" was defined
25 by the inventor during prosecution to mean that a "*non-single crystal semiconductor*" is a semi-
26 amorphous material that includes microcrystalline structures that have lattice strain and which
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2 are dispersed within an amorphous semiconductor material such that the "*non-single crystal*
3 *semiconductor*" is different from both amorphous or polycrystalline semiconductor materials.

4 As examples of intrinsic evidence upon which AU Optronics may rely, AU Optronics
5 cites the following from the prosecution history of the '941 patent: U.S. Patent Appl. Ser. No.
6 06/237,609, Application filed February 24, 1981, p. 9, l. 20 – p. 10, l. 3; *id.*, p. 11, ll. 1-12; *id.*,
7 p. 12, ll. 14-18; *id.*, p. 36; *id.*, Fig. 2; U.S. Patent Appl. Ser. No. 06/237,609, Amendment filed
8 December 13, 1982, p. 4; U.S. Patent Appl. Ser. No. 06/278,418, Application filed June 29,
9 1981, p. 8, ll. 2-6; *id.*, p. 15, ll. 7-15; *id.*, p. 17, l. 22 – p. 18, l. 6; p. 19, l. 12 – p. 20, l. 23; *id.*, p.
10 24, l. 12 – p. 25, l. 7; *id.*, p. 28, l. 24 – p. 29, l. 4; *id.*, p. 32, ll. 21-24; *id.*, p. 33, ll. 2-6; *id.*, Fig.
11 5; *id.*, Figs. 6D-6H (as found in PTO file); Translation of Japanese Patent Application No. 55-
12 088974, pp. 2, 6, 7-8, 10, 11, 12, 14, 15, 16, 17, 18, 19; U.S. Patent Appl. Ser. No. 06/278,418,
13 Amendment filed August 28, 1985, pp. 2-3, 5, 6; U.S. Patent Appl. Ser. No. 06/278,418,
14 Amendment filed September 12, 1985, pp. 3, 4, 5; U.S. Patent Appl. Ser. No. 06/775,767,
15 Amendment filed September 13, 1985, p. 5; Office Action mailed July 22, 1986, p. 3; U.S.
16 Patent Appl. Ser. No. 07/488,102, Amendment filed March 28, 1991, pp. 1-5; U.S. Patent Appl.
17 Ser. No. 07/488,102, Amendment filed May 2, 1991, pp. 2-11; U.S. Patent Appl. Ser. No.
18 07/602,167, Amendment filed October 23, 1990, pp. 1-2; U.S. Patent Appl. Ser. No.
19 07/602,167, Amendment filed May 2, 1991, pp. 4-9; U.S. Patent Appl. Ser. No. 07/602,167,
20 Office Action mailed June 13, 1991, p. 2; U.S. Patent Appl. Ser. No. 07/602,167, Amendment
21 filed December 12, 1991, pp. 7-11 and Appendices I & II; U.S. Patent Appl. Ser. No.
22 08/098,548, Amendment filed January 8, 1993, pp. 3-8; U.S. Patent Appl. Ser. No. 08/098,548,
23 Declaration of Shunpei Yamazaki, dated January 21, 1993; U.S. Patent Appl. Ser. No.
24 08/098,548, Supplemental Response filed August 13, 1993, pp. 1-4; U.S. Patent Appl. Ser. No.
25 08/098,548, Amendment filed April 22, 1994, pp. 1-9; U.S. Patent Appl. Ser. No. 08/098,548,
26 Office Action mailed July 14, 1994, pp. 2-5; U.S. Patent Appl. Ser. No. 08/098,548, paper no.
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2 24, Interview Summary; U.S. Patent Appl. Ser. No. 08/098,548, Amendment filed December 2,
3 1994, pp. 2-13; U.S. Patent Appl. Serial No. 08/371,486, Amendment filed January 11, 1995,
4 pp. 2-13; U.S. Patent Appl. Serial No. 08/371,486, Amendment filed June 21, 1995, pp. 1-16;
5 U.S. Patent Appl. Serial No. 08/371,486, Supplemental Information Disclosure Statement and
6 Response, filed October 17, 1995, pp. 1-4; U.S. Patent Appl. Serial No. 08/371,486,
7 Amendment filed May 29, 1996, pp. 8-14 and Appendix I; U.S. Patent Appl. Serial No.
8 08/371,486, paper no. 46, Interview Summary, Proposed Claims, pp. 9-11; U.S. Patent Appl.
9 Serial No. 08/371,486, Declaration of Shunpei Yamazaki, dated April 10, 1997; U.S. Patent
10 Appl. Serial No. 08/371,486, Amendment filed April 27, 1997, pp. 10-12, 18-21; U.S. Patent
11 Appl. Serial No. 08/371,486, Amendment filed January 22, 1998, pp. 1-3; U.S. Patent Appl.
12 Serial No. 08/371,486, Appeal Brief filed April 16, 1998, pp. 4-5, 7, 8, 10-13, 15-17; and U.S.
13 Patent No. 6,355,941, col. 3, ll. 40-44; *id.*, col. 6, ll. 21-29; *id.*, col. 7, ll. 19-28; *id.*, col. 7, l. 60
14 – col. 8, l. 30; *id.*, col. 9, l. 54 – col. 10, l. 8; *id.*, col. 11, ll. 34-38; *id.*, col. 12, ll. 62-65; *id.*, col.
15 13, ll. 1-5; *id.*, Fig. 5; Figs. 6D-6H.

16 As additional intrinsic evidence upon which AU Optronics may rely, AU Optronics cites
17 the following references from the prosecution history files of the '941 patent: U.S. Patent No.
18 3,191,061; U.S. Patent No. 3,265,981; U.S. Patent No. 3,271,632; U.S. Patent No. 3,339,128;
19 U.S. Patent No. 3,585,088; U.S. Patent No. 3,644,741; U.S. Patent No. 3,716,844; U.S. Patent
20 No. 3,771,026; U.S. Patent No. 3,988,720; U.S. Patent No. 3,999,212; U.S. Patent No.
21 4,062,034; U.S. Patent No. 4,117,506; U.S. Patent No. 4,217,374; U.S. Patent No. 4,224,084;
22 U.S. Patent No. 4,225,222; U.S. Patent No. 4,226,898; U.S. Patent No. 4,236,167; U.S. Patent
23 No. 4,239,554; U.S. Patent No. 4,240,843; U.S. Patent No. 4,254,429; U.S. Patent No.
24 4,270,018; U.S. Patent No. 4,272,880; U.S. Patent No. 4,317,844; U.S. Patent No. 4,339,285;
25 U.S. Patent No. 4,398,343; U.S. Patent No. 4,485,389; U.S. Patent No. 4,605,941; Translation
26 of Published Japanese Patent Application No. 55-11329; Translation of Published Japanese
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2 Patent Application No. 55-11330; Translation of Published Japanese Patent Application No. 55-
3 11330; Translation of Published Japanese Patent Application No. 55-11329; Translation of
4 Published Japanese Patent Application No. 55-13938; Translation of Published Japanese Patent
5 Application No. 55-13939; Japanese Published Patent Application No. 54-152894; Japanese
6 Published Patent Application 55-050663; Japanese Published Patent Application 55-050664;
7 W.E. Spear and P. G. Le Comber, "Electronic Properties of Substitutionally Doped Amorphous
8 Si and Ge", Philosophical Magazine, 1976, vol. 33. N. 6, 935-949; S.M. Sze, Physics of
9 Semiconductor Devices, pp. 568-621 (1969); M. Hirose, T. Suzuki, and G. H. Döhler,
10 "Electronic Density of States in Discharge-Produced Amorphous Silicon," Applied Physics
11 Letters, Vol. 34, No. 3, pp. 234-236 (Feb. 1, 1979); Nakamura et al., "Characteristics of
12 Amorphous silicon TFTs," Extended Abstracts (The 40th Autumn Meeting), The Japan Society
13 of Applied Physics, p. 325, 30P-S-17 (Sep. 1979); M. Hirose, T. Suzuki, and G. H. Doehler,
14 "Determination of Localized State Density Distribution in Glow Discharge Amorphous
15 Silicon," Proceedings of the 10th Conference on Solid State Devices, JAP, vol. 18, pp. 109-113
16 (1979); Matsumura et al., "a-Si Thin Film MOS Transistor," Extended Abstracts (The 40th
17 Autumn [sic?] Meeting), The Japan Society of Applied Physics, p. 326, 30P-S-18 (1979);
18 Hiroshi Hayama and Masakiyo Matsumura, "Amorphous-Silicon Thin-Film Metal Oxide-
19 Semiconductor Transistors," Applied Physics Letter, pp 754-755 (May 1980); M. Matsumura,
20 "Amorphous Silicon Thin-Film Electro Devices," The Japan Society of Applied Physics, vol.
21 49, No. 7, pp 729(81)-732(84) (July 10, 1980); A. F. Tasch, Jr., T. C. Holloway, K. F. Lee, J. F.
22 Gibbons, "Silicon-on-Insulator M.O.S.F.E.T.S. Fabricated on Laser-Annealed Polysilicon on
23 SiO₂," Electronics Letters, Vol. 15, No. 14, pp. 435-437 (Jul. 1979); A. Matsuda et al.,
24 "Electrical and Structural Properties of Phosphorus-Doped Glow-discharge Si:F:H and Si:H
25 Films" Japanese Journal of Applied Physics, vol. 19, No. 6, Jun., 1980, pp. L305-L308; A.
26 Madan, P. G. Le Comber and W.E. Spear, "Investigation of the Density of Localized States in a-
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2 Si Using the Field Effect Technique," J. of Non-Crystalline Solids 20, pp. 239-257 (1976);
3 Hiroshi Hayama and Masakiyo Matsumura, "a-Si FET IC Integrated on a Glass Substrate,"
4 National Convention Record, The Institute of Electronics and Communication Engineers of
5 Japan, S3-13, pp. 2-287 to 2-288 (Mar. 1980); T. I. Kamins, "Field-Effects in Polycrystalline-
6 Silicon Films," Solid-State Electronics, Vol. 15, pp 789-799 (Jul. 1972); Masakiyo Matsumura
7 and Yasuo Nara, "a-Si P Channel FET," National Convention Record, The Institute of
8 Electronics and Communication Engineers of Japan, pp. 2-281-282, S3-10 (Mar. 1980); W. E.
9 Spear and P. G. Le Comber, "Substitutional Doping of Amorphous Silicon," Solid State
10 Communications, vol. 17, No. 9, pp. 1193-1196 (Nov. 1975); Hiroshi Hayama and Masakiyo
11 Matsumura, "Amorphous Silicon Thin Film MOS Transistors," The Transactions of The
12 Institute of Electronics and Communication Engineers of Japan, Vol. J63-C No. 2, pp. 128-129,
13 (Feb. 1980); Matsumura et al., "a-Si FET Switching Properties," National Convention Record,
14 The Institute of Electronics and Communication Engineers of Japan, S3-12, pp. 2-285-286,
15 (Mar. 1980); Spear et al., "Investigation of the Localized State Distribution in Amorphous Si
16 Films," Journal of Non Crystalline Solids 8-10, pp. 727-738 (1972); and P. G. Le Comber, W.
17 E. Spear, A. Ghaith, "Amorphous-Silicon Field-Effect Device and Possible Application,"
18 Electronics Letters, Vol. 15, No. 6, pp. 179-181 (Mar. 1979).

19 Because AU Optronics relies on the inventor's foregoing special definition of non-single
20 crystal semiconductor, extrinsic evidence should not be permitted. Further, AU Optronics notes
21 that in the September 11, 2002 Case Management Order, this Court has ordered, in relevant part
22 in paragraph 4 concerning the claim construction hearing, that "[e]xpert testimony will normally
23 not be needed but all sides may have an expert present to address points outside the intrinsic
24 record should they arise." AU Optronics does not, therefore, identify any extrinsic evidence
25 under Patent L.R. 4-2(b). However, if the Court decides to permit extrinsic evidence, AU
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2 Optronics reserves the right to present extrinsic evidence concerning the phrase "non-single
3 crystal semiconductor".
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5 AU Optronics identifies the following term in asserted independent claims 3, 6, 10 and
6 11 and dependent claim 19 of the '941 patent for which it contends that construction by the
7 Court is necessary:
8

9 "... *intrinsic* ..."
10

11 AU Optronics contends that the term "*intrinsic*" has a well-understood definition to
12 those of ordinary skill in the relevant art, and that the term must be construed according to that
13 definition so that "*intrinsic*" denotes a semiconductor "in which the concentration of charge
14 carriers is characteristic of the material itself rather than of the content of impurities and
15 structural defects of the crystal." See Exhibit C, p. 1 (McGraw Hill's Encyclopedia of Science
16 and Technology on the Web, <http://www.accessscience.com> (hereinafter "McGraw Hill
17 accessscience.com website"), search result under Dictionary Term option, entries for "intrinsic
18 property" and "intrinsic semiconductor"); Exhibit D, p. 3 (McGraw Hill accessscience.com
19 website, search result under Encyclopedia Article option, section entitled "Intrinsic
20 semiconductors").

21 As additional examples of intrinsic evidence upon which AU Optronics may rely, AU
22 Optronics cites the following from the prosecution history of the '941 patent: U.S. Patent Appl.
23 Ser. No. 06/237,609, Application filed February 24, 1981, p. 9, l. 20 - p. 10, l. 3; *id.*, p. 12, ll.
24 14-18; *id.*, p. 16, l. 15 - p. 17, l. 8; *id.*, p. 26, l. 22- p. 27, l. 6; *id.*, p. 29, l. 10 - p. 30, l. 16; *id.*,
25 p. 36; U.S. Patent Appl. Ser. No. 06/237,609, Amendment filed December 13, 1982, p. 4; U.S.
26 Patent Appl. Ser. No. 06/278,418, Application filed June 29, 1981, p. 7, ll. 11-23; p. 9, l. 25 - p.
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2 10, l. 25; p. 17, l. 13 – p. 18, l. 6; p. 21, ll. 2-18; p. 22, l. 10 – p. 24, l. 6; p. 27, l. 22 – p. 28, l. 5;
3 Translation of Japanese Patent Application No. 55-088974, pp. 3, 4, 7-9, 10, 11-12, 14, 16-17;
4 U.S. Patent Appl. Ser. No. 06/278,418, Amendment filed August 28, 1985, pp. 2-3, 5, 6; U.S.
5 Patent Appl. Ser. No. 06/278,418, Amendment filed September 12, 1985, pp. 3, 4, 5; U.S.
6 Patent Appl. Ser. No. 06/775,767, Amendment filed September 13, 1985, p. 5; U.S. Patent
7 Appl. Ser. No. 07/488,102, Amendment filed March 28, 1991, pp. 1-5; U.S. Patent Appl. Ser.
8 No. 07/488,102, Amendment filed May 2, 1991, pp. 2-11; U.S. Patent Appl. Ser. No.
9 07/602,167, Amendment filed October 23, 1990, pp. 1-2; U.S. Patent Appl. Ser. No.
10 07/602,167, Amendment filed May 2, 1991, pp. 4-9; U.S. Patent Appl. Ser. No. 07/602,167,
11 Amendment filed December 12, 1991, pp. 7-11 and Appendices I & II; U.S. Patent Appl. Ser.
12 No. 08/098,548, Amendment filed January 8, 1993, pp. 3-8; U.S. Patent Appl. Ser. No.
13 08/098,548, Declaration of Shunpei Yamazaki, dated January 21, 1993; U.S. Patent Appl. Ser.
14 No. 08/098,548, Supplemental Response filed August 13, 1993, pp. 1-4; U.S. Patent Appl. Ser.
15 No. 08/098,548, Amendment filed April 22, 1994, pp. 1-9; U.S. Patent Appl. Ser. No.
16 08/098,548, Office Action mailed July 14, 1994, pp. 2-5; U.S. Patent Appl. Ser. No.
17 08/098,548, paper no. 24, Interview Summary; U.S. Patent Appl. Ser. No. 08/098,548,
18 Amendment filed December 2, 1994, pp. 2-13; U.S. Patent Appl. Serial No. 08/371,486,
19 Amendment filed January 11, 1995, pp. 2-13; U.S. Patent Appl. Serial No. 08/371,486,
20 Amendment filed June 21, 1995, pp. 1-16; U.S. Patent Appl. Serial No. 08/371,486,
21 Amendment filed October 10, 1995, pp. 12-13; U.S. Patent Appl. Serial No. 08/371,486,
22 Supplemental Information Disclosure Statement and Response, filed October 17, 1995, pp. 1-4;
23 U.S. Patent Appl. Serial No. 08/371,486, Amendment filed May 29, 1996, pp. 8-14 and
24 Appendix I; U.S. Patent Appl. Serial No. 08/371,486, paper no. 46, Interview Summary,
25 Proposed Claims, pp. 9-11; U.S. Patent Appl. Serial No. 08/371,486, Amendment filed July 31,
26 1996, pp. 13-15; U.S. Patent Appl. Serial No. 08/371,486, Declaration of Shunpei Yamazaki,
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1
2 dated April 10, 1997; U.S. Patent Appl. Serial No. 08/371,486, Amendment filed April 27,
3 1997, pp. 10-12, 18-21; U.S. Patent Appl. Serial No. 08/371,486, Amendment filed January 22,
4 1998, pp. 1-3; U.S. Patent Appl. Serial No. 08/371,486, Appeal Brief filed April 16, 1998, pp.
5 4-5, 7, 8, 10-13, 15-17; and U.S. Patent No. 6,355,941, col. 3, ll. 23-36; col. 4, ll. 21-49; col. 7,
6 ll. 10-28; col. 8, ll. 35-50; col. 9, ll. 1-47; col. 1, ll. 6-14.

7 As additional intrinsic evidence upon which AU Optronics may rely, AU Optronics cites
8 the following references from the prosecution history files of the '941 patent: U.S. Patent No.
9 3,191,061; U.S. Patent No. 3,265,981; U.S. Patent No. 4,117,506; U.S. Patent No. 4,217,374;
10 U.S. Patent No. 4,224,084; U.S. Patent No. 4,225,222; U.S. Patent No. 4,226,898; U.S. Patent
11 No. 4,236,167; U.S. Patent No. 4,239,554; U.S. Patent No. 4,240,843; U.S. Patent No.
12 4,254,429; U.S. Patent No. 4,270,018; U.S. Patent No. 4,272,880; U.S. Patent No. 4,317,844;
13 U.S. Patent No. 4,339,285; U.S. Patent No. 4,398,343; U.S. Patent No. 4,485,389; U.S. Patent
14 No. 4,605,941; Translation of Published Japanese Patent Application No. 55-11329; Translation
15 of Published Japanese Patent Application No. 55-11330; Translation of Published Japanese
16 Patent Application No. 55-11330; Translation of Published Japanese Patent Application No. 55-
17 11329; Translation of Published Japanese Patent Application No. 55-13938; Translation of
18 Published Japanese Patent Application No. 55-13939; Japanese Published Patent Application
19 No. 54-152894; Japanese Published Patent Application 55-050663; Japanese Published Patent
20 Application 55-050664; S.M. Sze, Physics of Semiconductor Devices, pp. 568-621 (1969);
21 W.E. Spear and P. G. Le Comber, "Electronic Properties of Substitutionally Doped Amorphous
22 Si and Ge", Philosophical Magazine, 1976, vol. 33. N. 6, 935-949; M. Hirose, T. Suzuki, and G.
23 H. Döhler, "Electronic Density of States in Discharge-Produced Amorphous Silicon," Applied
24 Physics Letters, Vol. 34, No. 3, pp. 234-236 (Feb. 1, 1979); Nakamura et al., "Characteristics of
25 Amorphous silicon TFTs," Extended Abstracts (The 40th Autumn Meeting), The Japan Society
26 of Applied Physics, p. 325, 30P-S-17 (Sep. 1979); M. Hirose, T. Suzuki, and G. H. Doehler,
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28

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2 "Determination of Localized State Density Distribution in Glow Discharge Amorphous
3 Silicon," Proceedings of the 10th Conference on Solid State Devices, JAP, vol. 18, pp. 109-113
4 (1979); Matsumura et al., "a-Si Thin Film MOS Transistor," Extended Abstracts (The 40th
5 Autumn [sic?] Meeting), The Japan Society of Applied Physics, p. 326, 30P-S-18 (1979);
6 Hiroshi Hayama and Masakiyo Matsumura, "Amorphous-Silicon Thin-Film Metal Oxide-
7 Semiconductor Transistors," Applied Physics Letter, pp 754-755 (May 1980); M. Matsumura,
8 "Amorphous Silicon Thin-Film Electro Devices," The Japan Society of Applied Physics, vol.
9 49, No. 7, pp 729(81)-732(84) (July 10, 1980); A. F. Tasch, Jr., T. C. Holloway, K. F. Lee, J. F.
10 Gibbons, "Silicon-on-Insulator M.O.S.F.E.T.S. Fabricated on Laser-Annealed Polysilicon on
11 SiO₂," Electronics Letters, Vol. 15, No. 14, pp. 435-437 (Jul. 1979); A. Matsuda et al.,
12 "Electrical and Structural Properties of Phosphorus-Doped Glow-discharge Si:F:H and Si:H
13 Films" Japanese Journal of Applied Physics, vol. 19, No. 6, Jun., 1980, pp. L305-L308; A.
14 Madan, P. G. Le Comber and W.E. Spear, "Investigation of the Density of Localized States in a-
15 Si Using the Field Effect Technique," J. of Non-Crystalline Solids 20, pp. 239-257 (1976);
16 Hiroshi Hayama and Masakiyo Matsumura, "a-Si FET IC Integrated on a Glass Substrate,"
17 National Convention Record, The Institute of Electronics and Communication Engineers of
18 Japan, S3-13, pp. 2-287 to 2-288 (Mar. 1980); T. I. Kamins, "Field-Effects in Polycrystalline-
19 Silicon Films," Solid-State Electronics, Vol. 15, pp 789-799 (Jul. 1972); S.M. Sze, Physics of
20 Semiconductor Devices, p. 32 (1981); W. E. Spear and P. G. Le Comber, "Substitutional
21 Doping of Amorphous Silicon," Solid State Communications, vol. 17, No. 9, pp. 1193-1196
22 (Nov. 1975); Hiroshi Hayama and Masakiyo Matsumura, "Amorphous Silicon Thin Film MOS
23 Transistors," The Transactions of The Institute of Electronics and Communication Engineers of
24 Japan, Vol. J63-C No. 2, pp. 128-129, (Feb. 1980); and P. G. Le Comber, W. E. Spear, A.
25 Ghaith, "Amorphous-Silicon Field-Effect Device and Possible Application," Electronics Letters,
26 Vol. 15, No. 6, pp. 179-181 (Mar. 1979).
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28

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2 Because AU Optronics relies on the customary and accepted definition of "intrinsic" to
3 those of ordinary skill in the relevant art, and intrinsic evidence, extrinsic evidence should not
4 be permitted. Further, AU Optronics notes that, in the September 11, 2002 Case Management
5 Order, this Court has ordered, in relevant part in paragraph 4 concerning the claim construction
6 hearing, that "[e]xpert testimony will normally not be needed but all sides may have an expert
7 present to address points outside the intrinsic record should they arise." AU Optronics does not,
8 therefore, identify any extrinsic evidence under Patent L.R. 4-2(b). AU Optronics nevertheless
9 encloses the technical dictionary and encyclopedia source materials from which it read the
10 ordinary and customary definition above, as it believes that such disclosures are consistent with
11 the intent of Patent L.R. 4-2(b). *See Texas Digital Systems, Inc., v. Telegenix, Inc.*, 308 F.3d
12 1193, 1202-1203 (Fed. Cir. 2002) (dictionaries, encyclopedias and treatises are particularly
13 useful resources, and may be the most meaningful sources of information, to assist the Court in
14 determining the ordinary and customary meanings that would be attributed to claim-terms by
15 those of ordinary skill in the relevant art). However, if the Court decides to permit extrinsic
16 evidence, AU Optronics reserves the right to present extrinsic evidence concerning the term
17 "intrinsic".
18

19 AU Optronics identifies the following term in asserted independent claims 3, 6, 10, 11,
20 12, 13, 14, 15, 16, 20 and 21 of the '941 patent for which it contends that construction by the
21 Court is necessary:
22

23 "... *channel region* ..." or "... *channel forming region* ..."
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25 AU Optronics contends that the term "*channel*" has a well-understood definition to those
26 of ordinary skill in the relevant art, and that the term must be construed according to that
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1
2 definition so that "*channel*" denotes "the main current path between the source and drain
3 electrodes in a field-effect transistor or other semiconductor device." Because the channel of a
4 field-effect transistor comes in and out of existence according to the charge applied to the
5 transistor gate, it is appropriate to reference a channel region or channel forming region, which
6 is that portion of the transistor where the channel forms. See Exhibit E, p. 1 (McGraw Hill
7 accessscience.com website, search result under Dictionary Term option, entry 2 for "channel ...
8 [ELECTRONICS]"); Exhibit F, pp. 5-7 (McGraw Hill accessscience.com website, search result
9 under Encyclopedia Article option, section entitled "MOSFETs").

10 As additional examples of intrinsic evidence upon which AU Optronics may rely, AU
11 Optronics cites the following from the prosecution history of the '941 patent: U.S. Patent Appl.
12 Ser. No. 06/278,418, Application filed June 29, 1981, p. 29, ll. 5-18; Figs. 6D-6H; Translation
13 of Japanese Patent Application No. 55-088974, p. 16; U.S. Patent Appl. Ser. No. 06/278,418,
14 Amendment filed August 28, 1985, pp. 2-3, 5, 6; U.S. Patent Appl. Ser. No. 06/278,418,
15 Amendment filed September 12, 1985, pp. 3, 4, 5; U.S. Patent Appl. Ser. No. 07/488,102,
16 Amendment filed March 28, 1991, pp. 1-4; U.S. Patent Appl. Ser. No. 07/488,102, Amendment
17 filed May 2, 1991, pp. 2-11; U.S. Patent Appl. Ser. No. 07/602,167, Amendment filed October
18 23, 1990, pp. 1-2; U.S. Patent Appl. Ser. No. 07/602,167, Amendment filed October 23, 1990,
19 pp. 1-2; U.S. Patent Appl. Ser. No. 07/602,167, Amendment filed May 2, 1991, pp. 4-9; U.S.
20 Patent Appl. Ser. No. 08/098,548, Amendment filed April 22, 1994, pp. 1-9; U.S. Patent Appl.
21 Ser. No. 08/098,548, Office Action mailed July 14, 1994, pp. 2-5; U.S. Patent Appl. Ser. No.
22 08/098,548, paper no. 24, Interview Summary; U.S. Patent Appl. Ser. No. 08/098,548,
23 Amendment filed December 2, 1994, pp. 2-13; U.S. Patent Appl. Serial No. 08/371,486,
24 Amendment filed January 11, 1995, pp. 2-13; U.S. Patent Appl. Serial No. 08/371,486,
25 Amendment filed June 21, 1995, pp. 1-16; U.S. Patent Appl. Serial No. 08/371,486,
26 Amendment filed October 10, 1995, pp. 12-13; U.S. Patent Appl. Serial No. 08/371,486,
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2 Supplemental Information Disclosure Statement and Response, filed October 17, 1995, pp. 1-4;
3 U.S. Patent Appl. Serial No. 08/371,486, Amendment filed May 29, 1996, pp. 8-14 and
4 Appendix I; U.S. Patent Appl. Serial No. 08/371,486, paper no. 46, Interview Summary,
5 Proposed Claims, pp. 9-11; U.S. Patent Appl. Serial No. 08/371,486, Amendment filed July 31,
6 1996, pp. 13-15; U.S. Patent Appl. Serial No. 08/371,486, Declaration of Shunpei Yamazaki,
7 dated April 10, 1997; U.S. Patent Appl. Serial No. 08/371,486, Amendment filed April 27,
8 1997, pp. 10-12, 18-21; U.S. Patent Appl. Serial No. 08/371,486, Amendment filed January 22,
9 1998, pp. 1-3; U.S. Patent Appl. Serial No. 08/371,486, Appeal Brief filed April 16, 1998, pp.
10 4-5, 7, 8, 10-13, 15-17; and U.S. Patent No. 6,355,941, col. 11, ll. 39-52; Figs. 6D-6H.

11 As additional intrinsic evidence upon which AU Optronics may rely, AU Optronics cites
12 the following references from the prosecution history files of the '941 patent: U.S. Patent No.
13 3,191,061; U.S. Patent No. 3,265,981; U.S. Patent No. 3,339,128; U.S. Patent No. 3,999,212;
14 U.S. Patent No. 4,236,167; U.S. Patent No. 4,272,880; Japanese Published Patent Application
15 No. 54-152894; Japanese Published Patent Application 55-050663; Japanese Published Patent
16 Application 55-050664; S.M. Sze, Physics of Semiconductor Devices, pp. 568-621 (1969);
17 Nakamura et al., "Characteristics of Amorphous silicon TFTs," Extended Abstracts (The 40th
18 Autumn Meeting), The Japan Society of Applied Physics, p. 325, 30P-S-17 (Sep. 1979); M.
19 Hirose, T. Suzuki, and G. H. Doehler, "Determination of Localized State Density Distribution in
20 Glow Discharge Amorphous Silicon," Proceedings of the 10th Conference on Solid State
21 Devices, JAP, vol. 18, pp. 109-113 (1979); Matsumura et al., "a-Si Thin Film MOS Transistor,"
22 Extended Abstracts (The 40th Autumn [sic?] Meeting), The Japan Society of Applied Physics,
23 p. 326, 30P-S-18 (1979); Hiroshi Hayama and Masakiyo Matsumura, "Amorphous-Silicon
24 Thin-Film Metal Oxide-Semiconductor Transistors," Applied Physics Letter, pp 754-755 (May
25 1980); M. Matsumura, "Amorphous Silicon Thin-Film Electro Devices," The Japan Society of
26 Applied Physics, vol. 49, No. 7, pp 729(81)-732(84) (July 10, 1980); A. Madan, P. G. Le
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2 Comber and W.E. Spear, "Investigation of the Density of Localized States in a-Si Using the
3 Field Effect Technique," J. of Non-Crystalline Solids 20, pp. 239-257 (1976); Hiroshi Hayama
4 and Masakiyo Matsumura, "a-Si FET IC Integrated on a Glass Substrate," National Convention
5 Record, The Institute of Electronics and Communication Engineers of Japan, S3-13, pp. 2-287
6 to 2-288 (Mar. 1980); T. I. Kamins, "Field-Effects in Polycrystalline-Silicon Films," Solid-State
7 Electronics, Vol. 15, pp 789-799 (Jul. 1972); J. C. Anderson, "Localized States in the Mobility
8 Gap of Amorphous Quartz and Glass," A Journal of Theoretical Experimental and Applied
9 Physics, pp. 839-851 (Oct. 1974); Masakiyo Matsumura and Yasuo Nara, "a-Si P Channel
10 FET," National Convention Record, The Institute of Electronics and Communication Engineers
11 of Japan, pp. 2-281-282, S3-10 (Mar. 1980); M.J. Lee, "Preparation and Reliability of Thin Film
12 Transistors Based on CdSe," Proc. 7th Intern. Vac. Congr. & 3rd Intern. Conf. Solid Surfaces,
13 pp. 1979-1982 (Vienna 1977); Hiroshi Hayama and Masakiyo Matsumura, "Amorphous Silicon
14 Thin Film MOS Transistors," The Transactions of The Institute of Electronics and
15 Communication Engineers of Japan, Vol. J63-C No. 2, pp. 128-129, (Feb. 1980); Matsumura et
16 al., "a-Si FET Switching Properties," National Convention Record, The Institute of Electronics
17 and Communication Engineers of Japan, S3-12, pp. 2-285-286, (Mar. 1980); Spear et al.,
18 "Investigation of the Localized State Distribution in Amorphous Si Films," Journal of Non
19 Crystalline Solids 8-10, pp. 727-738 (1972); and P. G. Le Comber, W. E. Spear, A. Ghaith,
20 "Amorphous-Silicon Field-Effect Device and Possible Application," Electronics Letters, Vol.
21 15, No. 6, pp. 179-181 (Mar. 1979).

22 Because AU Optronics relies on the customary and accepted definition of "channel" to
23 those of ordinary skill in the relevant art, and intrinsic evidence, extrinsic evidence should not
24 be permitted. Further, AU Optronics notes that, in the September 11, 2002 Case Management
25 Order, this Court has ordered, in relevant part in paragraph 4 concerning the claim construction
26 hearing, that "[e]xpert testimony will normally not be needed but all sides may have an expert
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2 present to address points outside the intrinsic record should they arise." AU Optronics does not,
3 therefore, identify any extrinsic evidence under Patent L.R. 4-2(b). AU Optronics nevertheless
4 encloses the technical dictionary and encyclopedia source materials from which it read the
5 ordinary and customary definition above, as it believes that such disclosures are consistent with
6 the intent of Patent L.R. 4-2(b). *See Texas Digital Systems, Inc.*, 308 F.3d at 1202-1203.
7 However, if the Court decides to permit extrinsic evidence, AU Optronics reserves the right to
8 present extrinsic evidence concerning the meaning of the phrase "channel region" or "channel
9 forming region".
10

11 **II. U.S. PATENT NO. 6,404,480**

12 AU Optronics identifies the following term in asserted independent claims 1 and 11 of
13 U.S. Patent No. 6,404,480 ("the '480 patent") for which it contends that construction by the
14 Court is necessary:
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16 *"... said second interlayer insulating film having at least two openings;"*
17

18 AU Optronics contends that the proper claim construction of the foregoing element in
19 independent claims 1 and 11 of the '480 patent is that the "*at least two openings*" in the second
20 layer insulating film must all face the conductive spacers recited later in the same claims. Such
21 a construction is essential to preserve the validity of these claims over prior art acknowledged in
22 Figures 12-14 of the '480 patent and provided therein as part of the intrinsic evidence, namely
23 plaintiff's Japanese patent application JP 9-094606 of March 27, 1997, relied on for foreign
24 priority, including Figure 13 thereof.

25 As identification of the intrinsic evidence upon which AU Optronics relies in support of
26 the foregoing construction, it identifies, in the patent prosecution file of the '480 patent, the
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2 verified translation of Japanese Patent Application No. 9-094606, filed on March 27, 1997, and
3 the Japanese patent application from which the translation was made. In particular, AU
4 Optronics identifies the representation of the prior art in FIGS. 12-14 of the Japanese application
5 attached to the verified translations and in the accompanying written description from page 7 of
6 the verified translations, para. [0005] through page 8, para. [0011] showing two openings
7 through the interlayer insulating film 18, namely (1) the opening by which the pixel electrode 19
8 is connected with the drain electrode of the TFT 17 and (2) the opening which receives the
9 conducting panel 22.

10 Because AU Optronics relies on the intrinsic evidence, extrinsic evidence should not be
11 permitted. Further, AU Optronics notes that, in the September 11, 2002 Case Management
12 Order, this Court has ordered, in relevant part in paragraph 4 concerning the claim construction
13 hearing, that "[e]xpert testimony will normally not be needed but all sides may have an expert
14 present to address points outside the intrinsic record should they arise." AU Optronics does not,
15 therefore, identify any extrinsic evidence under Patent L.R. 4-2(b). If, however, the Court
16 decides to permit extrinsic evidence, AU Optronics reserves the right to present extrinsic
17 evidence concerning the foregoing limitations.

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19 **III. U.S. PATENT NO. 5,929,527**

20 AU Optronics identifies the following term in asserted independent claim 1 of U.S.
21 Patent No. 5,929,527 ("the '527 patent") for which it contends that construction by the Court is
22 necessary:

23 *"... the film made of aluminum or a material containing aluminum as a*
24 *principal component contains oxygen atoms at a concentration of 8×10^{18}*
25 *atoms $\bullet\text{cm}^{-3}$ or less, carbon atoms at a concentration of 5×10^{18} atoms $\bullet\text{cm}^{-3}$ or*
26 *less, and nitrogen atoms at a concentration of 7×10^{17} atoms $\bullet\text{cm}^{-3}$ or less."*
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3 AU Optronics contends that each "*concentration*" recited above must be construed
4 according to the inventor's special definition that "[t]he concentration of impurity elements is
5 given by the maximum value measured by using SIMS (secondary ion mass spectroscopy)."
6 This construction must be applied with regard to the further teaching that "[c]are should be
7 taken in using SIMS for the measurement of the impurity concentrations, because a false value
8 is sometimes measured in the vicinity of the interface of the film."

9 As the intrinsic evidence on which AU Optronics relies, it identifies the statements in the
10 specification of the '527 patent at column 7, lines 63-65 and column 8, lines 8-11.

11 Because AU Optronics relies on the inventor's foregoing special definition of the
12 concentration, extrinsic evidence should not be permitted. Further, AU Optronics notes that, in
13 the September 11, 2002 Case Management Order, this Court has ordered, in relevant part in
14 paragraph 4 concerning the claim construction hearing, that "[e]xpert testimony will normally
15 not be needed but all sides may have an expert present to address points outside the intrinsic
16 record should they arise." AU Optronics does not, therefore, identify any extrinsic evidence
17 under Patent L.R. 4-2(b). If, however, the Court decides to permit extrinsic evidence, AU
18 Optronics reserves the right to present extrinsic evidence concerning determination of
19 concentration by SIMS.

20
21 **IV. U.S. PATENT NO. 6,404,476**

22 SEL, in its Patent L.R. 4-1 submission, has identified the following term in independent
23 claims 6 and 22 of U.S. Patent No. 6,404,476 for which it contends that construction by the
24 Court is necessary:
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2 Claim 6: *wherein said conductive adhesive extends lengthwise beyond each end of the*
3 *first and second electrodes.*
4

5 Claim 22: *each end of said first electrode and said second electrode is completely*
6 *covered by said resin in a lengthwise direction.*
7

8 Claim 6: AU Optronics contends that the proper claim construction of the foregoing
9 element of claim 6 is its literal meaning in which reference to “each end” of the electrode
10 implies it has at least two ends. In particular, for the first electrode, which has two opposite
11 ends as shown by element 9 in Figs. 2A and 2B of the patent, proper construction of this
12 element of claim 6 requires that, at both ends, the conductive adhesive extend lengthwise
13 beyond the end.
14

15 Claim 22: AU Optronics contends that the proper claim construction of the foregoing
16 element of claim 22 is its literal meaning in which the word lengthwise denotes a direction
17 along the length of the electrode. In particular, for the first electrode, this claim element of
18 claim 22 requires that the first electrode must be covered by the resin along at least a portion
19 that extends lengthwise, *i.e.*, for a distance that extends further in the direction of the length of
20 the electrode than it extends in the direction of its width.
21

22 As the intrinsic evidence on which AU Optronics relies in support of the foregoing
23 construction of claims 6 and 22, it identifies the language of claims 6 and 22 at column 6, lines
24 56-63, and column 8, lines 26-29, respectively. AU Optronics also relies upon the absence of
25 any teaching contrary to the ordinary English meaning of the claim language in the specification,
26 drawings or prosecution files.
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2 AU Optronics contends that, since the literal meaning controls, and under Federal
3 Circuit precedent, ordinary English dictionaries are intrinsic evidence, not extrinsic evidence
4 (*see, e.g., Texas Digital Systems, Inc., supra*), extrinsic evidence should not be permitted.

5 Further, AU Optronics notes that, in the September 11, 2002 Case Management Order, this
6 Court has ordered, in relevant part in paragraph 4 concerning the claim construction hearing, that
7 "[e]xpert testimony will normally not be needed but all sides may have an expert present to address
8 points outside the intrinsic record should they arise." AU Optronics does not, therefore, identify
9 any extrinsic evidence under Patent L.R. 4-2(b). If, however, the Court decides to permit extrinsic
10 evidence, AU Optronics reserves the right to present extrinsic evidence.

11
12 Dated: February 3, 2003

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15 By: 
16 Attorneys for Plaintiff and Counterclaim-
17 Defendant SEMICONDUCTOR ENERGY
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18
19 Dated: February __, 2003

HOGAN AND HARTSON, LLP

20 By: _____
21 Attorneys for Defendant and Counterclaimant AU
OPTRONICS CORPORATION

22 Dated: February __, 2003

ALSCHULER GROSSMAN STEIN & KAHAN,
LLP

24 By: _____
25 Attorneys for Defendant and Counterclaimant Acer
Incorporated and Acer America Corporation

1
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3 Circuit precedent, ordinary English dictionaries are intrinsic evidence, not extrinsic evidence
4 (*see, e.g., Texas Digital Systems, Inc., supra*), extrinsic evidence should not be permitted.

5 Further, AU Optronics notes that, in the September 11, 2002 Case Management Order, this
6 Court has ordered, in relevant part in paragraph 4 concerning the claim construction hearing, that
7 "[e]xpert testimony will normally not be needed but all sides may have an expert present to address
8 points outside the intrinsic record should they arise." AU Optronics does not, therefore, identify
9 any extrinsic evidence under Patent L.R. 4-2(b). If, however, the Court decides to permit extrinsic
10 evidence, AU Optronics reserves the right to present extrinsic evidence.

11
12 Dated: February __, 2003

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17 Defendant SEMICONDUCTOR ENERGY
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19 Dated: February 3, 2003

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22 Dated: February __, 2003

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25 Incorporated and Acer America Corporation

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3 Circuit precedent, ordinary English dictionaries are intrinsic evidence, not extrinsic evidence
4 (*see, e.g., Texas Digital Systems, Inc., supra*), extrinsic evidence should not be permitted.

5 Further, AU Optronics notes that, in the September 11, 2002 Case Management Order, this
6 Court has ordered, in relevant part in paragraph 4 concerning the claim construction hearing, that
7 "[e]xpert testimony will normally not be needed but all sides may have an expert present to address
8 points outside the intrinsic record should they arise." AU Optronics does not, therefore, identify
9 any extrinsic evidence under Patent L.R. 4-2(b). If, however, the Court decides to permit extrinsic
10 evidence, AU Optronics reserves the right to present extrinsic evidence.

11
12 Dated: February __, 2003

QUINN EMANUEL URQUHART
OLIVER & HEDGES, LLP

JENNER & BLOCK, LLC

MORI HAMADA & MATSUMOTO

15 By: _____
16 Attorneys for Plaintiff and Counterclaim-
17 Defendant SEMICONDUCTOR ENERGY
LABORATORY COMPANY, LTD.

18
19 Dated: February __, 2003

HOGAN AND HARTSON, LLP

20 By: _____
21 Attorneys for Defendant and Counterclaimant AU
OPTRONICS CORPORATION

22 Dated: February 3, 2003

ALSCHULER GROSSMAN STEIN & KAHAN,
LLP

23 By: Peter J. Wil
24 Attorneys for Defendant and Counterclaimant Acer
25 Incorporated and Acer America Corporation
26
27
28

Exhibit A
Intrinsic Evidence for SEL's Claim Constructions

U.S. Patent 6,355,941

| "non-single crystal semiconductor material" | |
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| '941 Patent, Column 3, lines 37-40 | "The non-single crystal semiconductor 7 means a semi-amorphous semiconductor, an amorphous semiconductor or a mixture thereof and it is desired to be the semi-amorphous semiconductor." |
| '941 Patent, Column 7, lines 29-36 | "The above has clarified the manufacturing method of the present invention and its advantages in the case where the non-single crystal semiconductor 7 is the semi-amorphous semiconductor. Also in the case where the non-single crystal semiconductor 7 is an amorphous semiconductor or a mixture of the semi-amorphous semiconductor and the amorphous semiconductor, it can be formed by the above-described method, although no description will be repeated." |
| '941 Patent, Column 8, lines 25-30 | "Even if the non-single crystal semiconductor 7 is the amorphous semiconductor or the mixture of the semi-amorphous and the amorphous semiconductor, the semi-amorphous semiconductor S2 is formed to have the same construction as in the case where the non-single crystal semiconductor 7 is the semi-amorphous one." |
| Prosecution History for U.S. Patent No. 5,091,334, Supplemental Amendment, May 2, 1991, Pg. 6 | "In single crystalline or polycrystalline semiconductors, there is no lattice strain and thus the semiconductor of claims 21 and 29 excludes the fabrication of polycrystalline and monocrystalline semiconductors. Moreover, due to the random location of the atoms in amorphous semiconductor material, there is no lattice strain such materials and thus claims 21 and 29 also exclude the fabrication of amorphous semiconductors. Hence, claims 21 and [29] are directed to the fabrication of a semi-amorphous (SAS) semiconductor" |
| '941 Patent Prosecution History, Third Preliminary Amendment, May 2, 1991, Pgs. 4 - 5 | "In single crystalline or polycrystalline semiconductors, there is no lattice strain and thus the semiconductor of claim 11 excludes polycrystalline and monocrystalline semiconductors. Moreover, due to the random location of the atoms in amorphous semiconductor material, there is no lattice strain in such materials and thus claim 11 also excludes amorphous semiconductors. Hence, claim 11 is directed to a semi-amorphous (SAS) semiconductor, which is characterized by a stable configurational state (see Fig. 5 of subject application) which occurs between the states associated with the amorphous and single crystalline (and polycrystalline states)." |
| '941 Patent Prosecution History, Examiner's Answer, August 24, 1998, Pgs. 3 - 4 | "Matsumura does not explicitly state the use of recombination center neutralizer atoms, however, it was well known from Ovshinsky to practice these neutralizers with non-single crystal (amorphous) material to improve device function." |

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| '941 Patent Prosecution History, Amendment, December 12, 1991, Pg. 8 | "With respect to '938 or '939, both of them also fail to disclose semiconductor materials which comprise a mixture of crystalline and amorphous structures. Rather, they simply disclose the semiconductor materials are non-single crystalline, i.e. polycrystalline or amorphous. (In those applications, "non-single crystalline" is a generic term for polycrystalline structure and amorphous structures.)" |
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U.S. Patent 6,355,941

| "channel region" or "channel forming region" | |
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| '941 Patent, Column 11, lines 39-49 | "The semiconductor device illustrated in FIG. 6H has a MIS type field effect transition structure which employs the regions 77 and 78 on the insulating substrate 62 as a source and a drain region, respectively, the region 79 as a channel region Since the regions 77, 78 and 79 serving as the source, the drain and the channel region have excellent properties as a semiconductor, the mechanism of an excellent MIS type field effect transistor can be obtained." |
| Figure 6H | See reference numeral 79 as described above. |
| '941 Patent Prosecution History, Amendment, December 2, 1994, Pg. 8 | "Referring to the rejection of claims 29-41, 51-61, 71, and 72 under 35 U.S.C. 103 over Dill '981 in view of Weimer '061, the present invention is characterized by a semiconductor device having a <u>non-doped non-single silicon</u> as a <u>channel</u> region extending between source and drain regions which comprise impurity doped non-single crystalline silicon." |
| '941 Patent Prosecution History, Amendment and Information Disclosure Statement, June 21, 1995, Pgs. 10-11 | "As discussed in the Amendment of December 2, 1994, the present invention is characterized by a semiconductor device having an <u>intrinsic or substantially intrinsic, non-single crystalline silicon</u> as a <u>channel</u> region extending between source and drain regions which comprise impurity doped non-single crystalline silicon." |

U.S. Patent 6,355,941

| "intrinsic" | |
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| Patent Prosecution History for U.S. Application No. 06/775,767, Office Action, July 22, 1986, Pg. 2 | "In claim 23, line 13 'having I conductivity type, is inappropriate since 'I' means intrinsic or 'undoped'." |
| '941 Patent Prosecution History, Amendment, December 2, 1994, Pgs. 8-9 | "Typically, the channel region is a I type layer while source and drain regions are N or P type. Thus, the characterizing feature of the <u>channel</u> of the semiconductor device of the present invention is that it is (a) non-single crystalline and (b) non-doped." |

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| '941 Patent Prosecution History, Declaration under 37 C.F.R. 1.132, January 21, 1993, Pg. 2 | "It should be noted that any impurity which renders the silicon p-type or n-type was not intentionally added in order that the deposited silicon is of intrinsic conductivity type." |
| JP Patent Application No. 53-83467, Pg. 6 (translation) | "When impurities such as phosphorus, arsenic, which provide N-conductivity type in a semiconductor, are mixed in the non-single-crystalline film . . . the so-called N-type semiconductors are produced. On the other hand, when diborane . . . is added at the same concentration, P-type semiconductors are produced. Furthermore, when no impurities whatsoever are added, the intrinsic or so-called substantially intrinsic semiconductors with the inclusion of background level impurities is obtained. In addition . . . hydrogen, deuterium, or a halogen compound such as chlorine is added to this non-single-crystalline film" |
| JP Patent Application No. 53-83467, Pg. 10 (translation) | "The semiconductor 26 and 27 are intrinsic or substantially intrinsic in light, although 26 has more additives than 27. 27 has a 1-5% nitrogen atomic concentration, 26 has 3-10%, and 25 has 5-30%." |
| '941 Patent Prosecution History, Amendment and Information Disclosure Statement, June 21, 1995, Pg. 11 | "Typically, the channel region is I type while the source and drain regions are both N type or both P type. Thus, the characterizing feature of the <u>channel</u> of the semiconductor device of the present invention is that it is (a) non-single crystalline and (b) intrinsic or substantially intrinsic." |
| '941 Patent Prosecution History, Office Action, July 14, 1994, Pg.3 | "Dill teaches a thin film transistor with a 'substantially intrinsic' or 'non-doped' channel region." |
| '941 Patent Prosecution History, Appeal Brief, April 16, 1998, Pg. 7 | "From the Office Action mailed June 14, 1996, the examiner appears to rely on Matsumura for the teaching of a thin film FET including an undoped or intrinsic channel region and n+ doped source and drain regions." |
| '941 Patent Prosecution History, Office Action, January 26, 1996, Pgs. 3-4 | "The prior art teaches doped source and drain regions, silicon nitride gate insulating film, and intrinsic or undoped channel regions in thin film structure." |

U.S. Patent 5,929,527

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| <p>"The film made of aluminum or a material containing aluminum as a principal component contains oxygen atoms at a concentration of 8×10^{18} atoms·cm⁻³ or less, carbon atoms at a concentration of 5×10^{18} atoms·cm⁻³ or less and nitrogen atoms at a concentration of 7×10^{17} atoms·cm⁻³ or less"</p> | |
| <p>'527 Patent, Column 1, lines 56-65</p> | <p>"According to one constitution of the present invention, there is provided an electronic device characterized in that it comprises a film pattern made of aluminum or a material containing aluminum as the principal component thereof, wherein the film made of aluminum or a material containing aluminum as the principal component contains oxygen atoms at a concentration of 8×10^{18} atoms·cm⁻³ or less, carbon atoms at a concentration of 5×10^{18} atoms·cm⁻³ or less, and nitrogen atoms at a concentration of 7×10^{17} atoms·cm⁻³ or less."</p> |
| <p>'527 Patent, Column 7, lines 62-64</p> | <p>"The concentration of impurity elements [given in Table 1] is given by the maximum value measured by using SIMS (secondary ion mass spectroscopy)."</p> |
| <p>'527 Patent, Column 8, lines 8-11</p> | <p>"Care should be taken in using SIMS for the measurement of the impurity concentration, because a false value is sometimes measured in the vicinity of the interface of the film."</p> |

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| <p>“wherein said conductive adhesive extends lengthwise beyond each end of the first and second electrodes” and “each end of said first electrode and said second electrode is completely covered by said resin in a lengthwise direction”</p> | |
| <p>‘476 Patent Prosecution History, Amendment, December 2, 1999, page 4</p> | <p>“Independent claim 23 has been amended to recite that an end of the electrodes is completely covered by the conductive paste. That is, the conductive paste extends beyond an end of the electrodes. Please see Fig. 3 of the present application in this regard. This feature is advantageous to improve the reliability of the electrical and mechanical connection between the two parts, i.e., the first and second electrodes. Specifically, since the end of the electrodes is completely covered by a resin, it is possible to avoid problems caused by moisture.”</p> |
| <p>‘476 Patent Prosecution History, Amendment, December 2, 1999, page 2</p> | <p>“wherein said conductive adhesive extends beyond each end of said first and second electrodes”</p> |
| <p>‘476 Patent Prosecution History, December 2, 1999, page 3</p> | <p>“and each end of said first electrode and said second electrode is completely covered by said resin”</p> |
| <p>‘476 Patent Prosecution History, After Final Amendment, July 3, 2000, page 2</p> | <p>“an electrically conductive adhesive, through which said first and second electrodes are connected to each other, wherein said conductive adhesive extends lengthwise beyond each end of the first and second electrodes”</p> |
| <p>‘476 Patent Prosecution History, After Final Amendment, July 3, 2000, page 2</p> | <p>“wherein each of said conductive particles comprises a resilient particle coated with a metal film, and each end of said first electrode and said second electrode is completely covered by said resin in a lengthwise direction.”</p> |
| <p>‘476 Patent Prosecution History, After Final Amendment, July 3, 2000, page 3</p> | <p>“The present invention, as currently set forth in independent claims 23 and 47 and illustrated in Fig. 3, for example, discloses an adhesive that overlaps, in a lengthwise direction electrode strips 9 located on opposing substrates 1. In the Official Action, Tsukagoshi document is utilized to teach the use of resilient conductive particles and spacer particles. As illustrated in Fig. 3 of Tsukagoshi, this reference illustrates a cross-sectional view of connected conductors. Adhesive 4 enables electroconductive adhesion between conductors 5 and 6.”</p> |
| <p>‘476 Patent Prosecution History, After Final Amendment, July 3, 2000, pages 3-4</p> | <p>“Turning to the claims, Applicant respectfully submits that Tsukagoshi does <u>not</u> disclose an electrically conductive adhesive, through which said first and second electrodes are connected to each other, wherein said conductive adhesive extends <u>lengthwise</u> beyond each end of the first and second electrodes as now recited in claim 23, or that each end of said first electrode and said second electrode is completely covered by said resin <u>in a lengthwise direction</u>, as now recited in claim 47.”</p> |

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| U.S. Patent No. 4,999,460 to Sugiyama et al., | Figs. 1 and 8 |
| '476 Patent Prosecution History, Response, June 20, 2001 | "With respect to claim rejections, Applicant will submit a verified English Translation of the Japanese priority document in order to overcome the outstanding rejections based on Sugiyama et al. The filing date of the Japanese Priority Application is September 1, 1989, while Sugiyama et al. was filed November 6, 1989. Thus, Sugiyama et al. is not prior art." |
| Japanese Priority Document No. 1-232308 | Fig. 2 |
| '476 Patent | Fig. 3 |
| '476 Patent, Column 2, lines 42-44 | "Fig. 3 is a partial cross-sectional view showing electrical connection between substrates carrying electrode strips in accordance with the present invention." |
| '476 Patent, Column 2, lines 64-67 | "The auxiliary substrates 3 and the substrates 1 and 2 are connected respectively at their edges in order to establish electrical coupling between corresponding electrodes." |
| '476 Patent, Column 3, lines 38-43 | "One side of each of the first and second substrates extends together with the electrode strips and is exposed beyond the other substrate in order to provide contacts for electrically connection with the driving circuits formed on the auxiliary substrates 3 as shown in Fig. 1." |
| '476 Patent, Column 3, lines 62-67, Column 4, lines 1-14 | "The electric connection between the first and second substrates 1 and 2 and the counterpart auxiliary substrates 3 respectively are done as follows. The extended inside surfaces of the first substrates 1 on which terminals of the respective electrodes are exposed are coated, by means of a dispenser, with an anisotropic conductive film. The adhesive film is made from a UV light curable adhesive 8 in which a number of resilient fine conductive particles 6 and hard particles 7 whose diameter is slightly smaller than that of the resilient particles are dispersed. The resilient particles are made from 7.5 μm thick polystyrene spheres plated with a 1000 angstroms thick Au film. The hard particles are made from 5 μm thick SiO_2 spheres. The weight proportion among the adhesive, the resilient particles and the hard particles is 107:14:1. Then, the first substrate 1 and the auxiliary substrates 3 are joined with the adhesive therebetween in order that the terminals of the first substrate 1 and the corresponding contacts of the auxiliary substrate 3 are aligned to each other, and exposed to UV light for 3 minutes under pressure of about 2.4 kg/cm^2 ." |

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| <p>'476 Patent, Column 4, lines 47-66</p> | <p>"The electric connection between the first and second substrates 1 and 2 and the counterpart auxiliary substrates 3 respectively are done as follows. The extended inside surfaces of the first substrates 1 on which terminals of the respective electrodes are exposed are coated, by means of a dispenser, with an anisotropic conductive film. The adhesive film is made from a UV light curable adhesive 8 in which a number of resilient fine conductive particles 6 and hard particles 7 whose diameter is slightly smaller than that of the resilient particles are dispersed. The resilient particles are made from 2.5 μm thick polystyrene [<i>sic</i>: polystyrene] spheres plated with a 1000 angstroms thick Au film. The hard particles are made from 2 μm thick SiO_2 spheres. The weight proportion among the adhesive, the resilient particles and the hard particles is 98:13:3. Then, the first substrate 1 and the auxiliary substrates 3 are joined with the adhesive therebetween in order that the the [<i>sic</i>] terminals of the first substrate 1 and the corresponding contacts of the auxiliary substrate 3 are aligned to each other, and exposed to UV light for 3 minutes under pressure of about 2.4 kg/cm^2."</p> |
| <p>'476 Patent, Column 5, lines 33-40</p> | <p>"One side of each of the first and second substrates extends together with the electrode strips and is exposed beyond the other substrate in order to provide contacts for electrically connection with the driving circuits formed on the auxiliary substrates 3 as shown in FIG. 1. Then, a pair of auxiliary substrates are provided, tested and coupled with the liquid crystal panel in the same manner as the above embodiment."</p> |

| "Second interlayer insulating film having at least two openings" | |
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| '480 Patent, Abstract, lines 9-11 | "Openings are formed in the dielectric film. A second conducting film covers the dielectric film left and the openings." |
| '480 Patent, Column 2, lines 30-58 | <p>"In the prior art liquid crystal display, the interlayer dielectric film 18 is provided with the opening at the common contact portion 16, as shown in FIG. 13. Therefore, the cell gap G_c in the common contact portion is almost equal to the sum of the cell gap G_p in the pixel region+the film thickness t of the interlayer dielectric film 18.</p> <p>"The cell gap G_p (also known as the cell spacing) in the pixel region 12 is determined by the insulating spacers 25. It is common practice to use standardized spacers as the insulating spacers 25 and so if the spacers 25 have a uniform diameter, the cell gap G_p in the pixel region 12 is substantially uniform among liquid-crystal cells. However, it is difficult to avoid nonuniformity of the cell gap G_c in the common contact portion among liquid-crystal cells.</p> <p>"The cell gap G_p in the common contact portion is constant since the cell gap G_p is constant because of the relation described above. Therefore, the cell gap G_c in the common contact portion depends only on the film thickness t of the interlayer dielectric film 18. Consequently, to make the cell gap G_c uniform among liquid-crystal cells, it is necessary that the film thickness t of this interlayer dielectric film 18 be uniform among cells. However, this is impossible to circumvent.</p> <p>"Normally, the common contact portions of the liquid crystal display are 2 to 4 in number. The film thickness t of the interlayer dielectric film 18 may differ from location to location on the same substrate. In this case, the film thickness t may differ among different common contacts even on the same substrate.</p> <p>"Because of the aforementioned nonuniformity of the thickness t of the interlayer dielectric film 18, the cell gap G_c in the common contact portion differs among different cells or different common contacts. Furthermore, the nonuniformity of the cell gap G_c results in the cell gap G_p in the pixel region to be nonuniform."</p> |
| '480 Patent, Column 3, lines 22-28 | "It is an object of the present invention to provide a contact structure which is free of the foregoing problems, provides less nonuniform cell gap among different cells if the thickness of the interlayer dielectric film is nonuniform across the cell or among different cells, and reduces poor electrical contacts which would normally be caused by conducting spacers." |

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| <p>'480 Patent, Column 3 lines 29-44</p> | <p>"This object is achieved in accordance with the teachings of the invention by a contact structure for connecting a conducting film formed on a first substrate with a conducting film formed on a second substrate opposite to the first substrate, the contact structure comprising: a cell gap defined between the first and second substrates; a first conducting film formed on the first substrate; a dielectric film covering the first conducting film; openings formed in the dielectric film to expose parts of the first conducting film by selectively leaving the dielectric film; a second conducting film covering the dielectric film left and the openings; a third conducting film formed on the second substrate; and conducting spacers held between the first and second substrates and connecting the second and third conducting films. The second conducting film is connected with the first conducting film through the openings."</p> |
| <p>'480 Patent, Column 3 lines 49-65</p> | <p>"One embodiment of the invention resides in a contact structure for connecting a conducting film formed on a first substrate with a conducting film formed on a second substrate opposite to the first substrate, the contact structure comprising: a cell gap defined between the first and second substrates; a first conducting film formed on the first substrate; a dielectric film covering the first conducting film; openings formed in the dielectric film to expose parts of the first conducting film; an insulator deposited on only portions of the first conducting film exposed through the openings; a second conducting film covering the openings; a third conducting film formed on the second substrate; and conducting spacers held between the first and second substrates and connecting the second and third conducting films. The second conducting film is connected with the first conducting film through the openings extending through the insulator."</p> |
| <p>'480 Patent, Column 4, lines 3-20</p> | <p>"Another embodiment of the invention resides in a contact structure for connecting a conducting film formed on a first substrate of an electrooptical device with a counter electrode formed on a second substrate opposite to the first substrate, which has pixel electrodes formed thereover, the contact structure comprising: a cell gap defined between the first and second substrates; a first conducting film formed on the first substrate and under the pixel electrodes; an interlayer dielectric film covering the first conducting film; openings formed in the interlayer dielectric film to expose parts of the first conducting film by selectively leaving the interlayer dielectric film; a second conducting film defining the counter electrode formed on the second substrate; a third conducting film covering the interlayer dielectric film left and the openings; and conducting spacers held between the first and second substrates and connecting the second and third conducting films. The second conducting film is connected with the first conducting film through the openings."</p> |

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| <p>'480 Patent, Column 4 lines 27-47</p> | <p>"A further embodiment of the invention resides in a contact structure for connecting a first conducting film formed over a first substrate of an electrooptical device with a counter electrode formed on a second substrate opposite to the first substrate, which has pixel electrodes formed thereon, the contact structure comprising: a cell gap defined between the first and second substrates; a first conducting film formed on the first substrate and under the pixel electrodes; an interlayer dielectric film covering the first conducting film; openings formed in the interlayer dielectric film to expose parts of the first conducting film; an insulator formed on selected portions of the surface of the first conducting film extending through the openings; a second conducting film covering the openings; a third conducting film defining the counter electrode formed on the second substrate; conducting spacers held between the first and second substrates and connecting the second and third conducting films. The pixel electrodes and the second conducting film are formed from a common starting film. The second conducting film is connected with the first conducting film through the openings extending through the insulator."</p> |
| <p>'480 Patent, Column 4 line 52 – Column 5 line 2</p> | <p>"A still other embodiment of the invention resides in a contact structure for connecting a conducting film formed on a first substrate with a conducting film formed on a second substrate opposite to the first substrate, the contact structure comprising: a cell gap defined between the first and second substrates; a first conducting film formed on the first substrate; a dielectric film covering the first conducting film; openings formed in the dielectric film and exposing parts of the first conducting film; a second conducting film covering the openings; a third conducting film formed over the second substrate; a fourth conducting film formed between the second substrate and the third conducting film and in contact with the third conducting film; and conducting spacers held between the first and second substrates. The first conducting film, the second conducting film, the conducting spacers, the third conducting film, and the fourth conducting films are connected in turn through the openings. The spacers maintain the cell gap between the first and second substrates."</p> |
| <p>'480 Patent, Column 5 lines 66-67</p> | <p>"In the present embodiment, openings are formed, selectively leaving the interlayer dielectric film 18."</p> |
| <p>'480 Patent, Column 6 lines 4-8</p> | <p>"The dielectric film 104 is selectively left to form openings 111 that expose parts of the first conducting film 103. A second conducting film 105 is formed so as to cover the left parts of the dielectric film, 104a, and the openings 111."</p> |
| <p>'480 Patent, Column 6 lines 12-18</p> | <p>"In the present embodiment, the dielectric film 104 is selectively left to form the dielectric film portions 104a and the openings 111. The openings 111 expose parts of the first conducting film 103. The first conducting film 103 is connected with the second conducting film 105 at these openings 111."</p> |

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| '480 Patent, Column 6 lines 34-39 | "In the present embodiment, it is desired that the area of each opening 111 be sufficiently larger than the area occupied by each conducting spacer and offer space so that the conducting spacers can move freely, because the spacers 107 existing in the openings 111 do not contribute toward maintaining the gap." |
| '480 Patent, Column 6 line 51-52 | "The openings 111 are formed as shown in FIG. 2A in the present embodiment." |
| '480 Patent, Column 7 lines 2-3 | "The present embodiment is characterized in that the dielectric film 18 is selectively left to form openings." |
| '480 Patent, Column 7 lines 12-14 | "The dielectric film 104 is provided with openings 111 to selectively expose the surface of the first conducting film 103." |
| '480 Patent, Column 7 lines 15-16 | "A second conducting film 105 is formed to cover the openings 111." |
| '480 Patent, Column 9 lines 60-64 | "Contact holes for gaining access to the source and drain regions 310 and 311, respectively, were created in the first interlayer dielectric film 315. Contact holes for allowing access to the internal conducting lines 207c were formed in the common contact portions 206c and 206d." |
| '480 Patent, Column 10 lines 24-36 | "Then, contact holes 320 and 321 were formed in the second interlayer dielectric film 319 to have access to the drain electrode 317 and to the internal conducting lines 318, respectively. The contact holes 321 for the internal conducting lines 318 were formed in the openings 111 shown in FIG. 2A. That is, rectangular holes measuring 100 μ m x 100 μ m were arranged in 5 rows and 5 columns within the rectangular region 110 measuring 1.1 mm x 1.1 mm. These holes were spaced 100 μ m from each other. Moreover, the contact holes for connecting the internal conducting lines 318 (207a and 207b) with the common terminals 205a and 205b at the extractor terminals 205 were formed." |
| '480 Patent, Column 10 lines 37-39 | "As described later, the size of each hole was set to 100 μ m x 100 μ m to set the diameter of the conducting spacers to 3.5 μ m in this example." |
| '480 Patent, Column 10 lines 56-58 | "This pad 323 measured 1.1 mm x 1.1 mm, was rectangular, and covered the contact holes 321." |
| '480 Patent | Figures 1, 2A, 5F, 5G, 6, 7, 8, 9, 10 |

Extrinsic Evidence for SEL's Claim Constructions

U.S. Patent 6,355,941

| "intrinsic" |
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| Nakano, Shoichi, <i>et al.</i> , "High Performance a-Si Solar Cells and Narrow Bandgap Materials," Mat. Res. Soc. Symp. Proc. Vol. 49 (1985) |
| Kaneko, S., <i>et al.</i> , "Amorphous Si:H Heterojunction Photodiode and its Application to a Compact Scanner," Mat. Res. Soc. Symp. Proc. Vol. 49 (1985) |
| Suzuki, Kouji, <i>et al.</i> , "14.2/9:25 A.M.: High-Resolution Transparent-Type a-Si TFT LCDs," 146 SID 83 Digest (1983) |
| Nagayasu, T., <i>et al.</i> , "1988 International Display Research Conference – A 14-in.-Diagonal Full-Color a-Si TFT LCD" (1988) |
| Ichikawa, K., <i>et al.</i> , "14.1: 14.3-in.-Diagonal 16-Color TFT-LCD Panel Using a Si:H TFTs," 226 SID 89 Digest (1989) |
| Martin, Russel A., <i>et al.</i> , "High Voltage Amorphous Silicon Thin-Film Transistors," IEEE Transactions on Electron Devices, Vol. 40, No. 3 (1993) |

EXHIBIT B

SEL'S EXPERT WITNESSES FOR CLAIM CONSTRUCTION HEARING

- 1) PAUL A. KOHL, Ph.D.
- 2) L. RAFAEL REIF, Ph.D.

Curriculum Vitae

Paul A. Kohl, Ph.D.

PROFESSIONAL EXPERIENCE

| | |
|------------------------|--|
| 1989 to Present | Georgia Institute of Technology |
| 1999 to Present | Regents Professor |
| 1994 to 1999 | Professor |
| 1989 to 1994 | Associate Professor |
| 1978 to 1989 | AT&T Bell Laboratories |
| 1982 to 1989 | Technical Supervisor |
| 1978 to 1982 | Member of Technical Staff |

CURRENT RESEARCH PROJECTS

1. *Electronic Packaging*: Director of materials and processing research for NSF Center of Excellence in Electronic Packaging at Georgia Tech. Current project include design of advanced packaging structures, rapid processing methods, and novel interconnection materials. Courses developed and taught include Ch.E./E.C.E 4803 Fabrication of advanced printed circuit boards.
2. *Interconnects for Future Integrated Curcuits*: Director of Research for the Georgia Tech portion of the Interconnect Focus Center (IFC), sponsored by the SIA (via MARCO), and DARPA. The IFC is housed at Georgia Tech with contributions from other universities. The focus of the work is advanced interconnection and assembly of integrated circuits. Courses developed and taught include Ch.E./E.C.E. 4752 CMOS integrated circuit fabrication laboratory course, and Ch.E. 4400 Chemical and Process Safety.
3. *Power Sources for Integrated Curcuits*: The integration of microfuel cells into integrated circuits for on-board power.
4. *Insulators for Integrated Circuits*: Ultra low dielectric constant insulators for integrated circuit and printed wiring board uses.

5. *Novel Uses of IC Technology*: Microfluidic devices on silicon for lab-on-a-chip applications sponsored by NSF.
6. *Low Temperature Molten Salts- Electrodeposition and Batteries*: New room temperature ionic liquids are promising electrolytes for deposition of metals for producing novel deposits and high energy density batteries, sponsored by the Department of Energy.

PREVIOUS RESEARCH PROJECTS AT BELL LABORATORIES

1. *New Chemical Processes for the Manufacture of Printed Wiring Boards*. This includes the development and implementation of high speed solder, gold, and copper processes, and the reduction in the use and discharge of chemicals.
2. *Integrated Electrical and Optoelectronic Devices*: This includes the invention of new manufacturing methods for the production of integrated devices into field effect transistors, and optoelectronic devices.
3. *Thin Film Analysis Laboratory*: Formed and staffed a state-of-the-art analytical laboratory of the characterization and analysis of thin films for the development of next generation silicon and compound semiconductor devices.
4. *Silicon-on-Silicon Electronic Packaging*: Lead a research and development group for ultra high density packaging of CMOS silicon devices. The includes the operation of a prototype manufacturing facility.
5. *CMOS Device Development Laboratory*: Responsible for the 0.9 μm CMOS device development line where new processes and products were investigated.

OTHER PROFESSIONAL EXPERIENCE

Consulting Experience

- AT&T Bell Laboratories (1989-1991): Fabrication of multi-chip modules (electronic packaging) for advanced VLSI.
- N-Chip Inc. (1990-1992): Processing of multi-chip modules.
- Bell South, high capacity power sources.
- Curry Manufacturing (1993-1995): Design and fabrication of electroluminescent devices.
- Superior Teletec (1993-1995): Fabrication of advanced electronic displays- product evaluation.
- BFGoodrich (1993-present): Synthesis of microelectronic polymer materials.
- Amoco Performance Products (1994-1997): Microelectronic uses of polymers and carbon fibers.
- Lester Manufacturing (1996-1999): Chemicals used in consumer products.
- 3M (1997-present): Chemical mechanism for the Simons process (synthesis of perfluorination).
- Sachem (1998-present): The use of quaternary amines in microelectronics.

- Emissarius Ltd. (1998-present): Marketing of polymers in Microelectronics.

EDUCATION

Ph.D., Chemistry (Electrochemistry), University of Texas at Austin, 1978
BS, Chemistry, Bethany College, 1974

PATENTS

| <u>Patent Number</u> | <u>Year Issued</u> | <u>Title</u> |
|----------------------|--------------------|--|
| 6,165,890 | 2000 | Fabrication of a Semiconductor Device with Air Gaps for Ultra-Low Capacitance Interconnections |
| 6,162,838 | 2000 | Porous Insulating Compounds and Method for Making Same |
| 6,141,072 | 2000 | System and Method for Efficient Manufacturing of Liquid Crystal Displays |
| 5,468,688 | 1995 | Process for the Low Temperature Creation of Nitride Films on Semiconductors |
| 5,348,627 | 1994 | Process and System for the Photoelectrochemical Etching of Silicon in an Anhydrous Environment |
| 4,689,125 | 1987 | Fabrication of Cleaved Semiconductor Lasers |
| 4,622,114 | 1986 | Process of Producing Devices with Photoelectrochemically Produced Gratings |
| 4,576,691 | 1986 | Etching Optical surfaces on GaAs |
| 4,482,443 | 1984 | Photoelectrochemical Etching of n-type Si |
| 4,482,442 | 1984 | Photoelectrochemical Etching of n-Type Gallium Arsenide |

| | | |
|-----------|------|---|
| 4,425,196 | 1984 | Photoelectrochemical Plating of Silver |
| 4,415,414 | 1983 | Etching of Optical surfaces |
| 4,414,066 | 1983 | Electrochemical Photoetching of Compound Semiconductors |
| 4,404,072 | 1983 | Photoelectrochemical of Processing III-V Semiconductors |
| 4,399,004 | 1983 | Photoelectrochemical Gold Plating Process |
| 4,389,291 | 1983 | Photoelectrochemical Processing of InP Type Devices |
| 4,379,738 | 1983 | Electro Plating Zinc |
| 4,377,449 | 1983 | Electrolytic Silver Plating |
| 4,377,448 | 1983 | Electrolytic Gold Plating |
| 4,376,018 | 1983 | Electrodeposition of nickel |
| 4,369,099 | 1983 | Photoelectrochemical Etching of Semiconductors |
| 4,310,392 | 1982 | Electrolytic Plating |
| 4,263,106 | 1981 | Solder Plating Process |
| 4,236,976 | 1980 | Preventing Stains on Multiple-Electroplated Articles |
| 4,229,269 | 1980 | Spray Cell for Selective Metal Deposition or Removal |

PROFESSIONAL AFFILIATIONS & AWARDS

Editorial Service

Editor-in-Chief, *Journal of The Electrochemical Society*, 1995-present

Editor-in-Chief (Founding Editor), *Electrochemical and Solid-State Letters*, 1998-present

Editor (Founding Editor), The Electrochemical Society Interface, 1992-1995

Affiliations

Member, Electrochemical Society
Member, American Institute of Chemical Engineers (AIChE)
Member, American Chemical Society
Member, Materials Research Society

Honors and Awards

Carl Wagner Memorial Award, The Electrochemical Society, 2001
Research Award: NSF-ERC in Electronic Packaging, 1999.
Research Program Development Award, 1995, Georgia Tech.
Named Institute Fellow, 1994, Georgia Tech.
Outstanding Faculty Award, 1990-1991, Chemical Engineering, Georgia Tech.
Outstanding Faculty Award, 1990-1991, AIChE Student Chapter Georgia Tech.
Outstanding Alumni Achievement Award presented by Bethany College in 1986.
Named one of "America's 100 Brightest Scientists Under 40" by Science Digest in 1985.
Edward Weston Fellowship from the Electrochemical Society in 1977.
Gilbert H. Ayers for outstanding graduate work in chemistry in 1977.
Awarded Academic Distinction in chemistry from Bethany College in 1974.
Analytical Chemistry Award from the American Chemical Society in 1973.

PUBLICATIONS

Refereed Journal Papers

1. Kohl, P.A., and Bard, A.J., "The Characterization and Behavior of n-Type ZnO, CdS and GaP Electrodes in Acetonitrile Solutions," *Journal of the American Chemical Society*, 99, 7531-7539 (1977).
2. Kohl, P.A., Frank, S.N., and Bard, A.J., "Behavior of n- and p-Type single Crystal Semiconductors Covered with Thin n-TiO₂ Films," *Journal of the Electrochemical Society*, 124, 225-229 (1977).
3. Noufi, R.N., Kohl, P.A. and Bard, A.J., "Electrochemistry and Electroluminescence at n-Type TiO₂ in Aqueous Solutions," *Journal of the Electrochemical Society*, 125, 246-252 (1978).

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5. Kohl, P.A. "The Electrochemical Behavior of n- and p-GaAs and InP in Nonaqueous Solutions," *Journal of the Electrochemical Society*, 125, 283-286 (1978).
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8. Kohl, P.A., and Bard, A.J., "Liquid Junction Photovoltaic Cells Based on n-GaAs Electrodes in Acetonitrile Solutions," *Journal of the Electrochemical Society*, 126, 603-608 (1979).
9. Noufi, R.N., Kohl, P.A., Rogers, J.W., White, J.M., and Bard, A.J., "An Investigation of S/Se Substitution in single Crystal CdSe and CdS Photoelectrodes by Electron Spectroscopy," *Journal of the Electrochemical Society*, 126, 949-954 (1979).
10. Ostermayer, F.W. Jr. and Kohl, P.A., "Photoelectrochemical Etching of p-GaAs," *Applied Physics Letters*, 39, 76-78 (1981).
11. Kohl, P.A., "High Speed Solder Plating Baths," *Plating and Surface Finishing*, 45-48 (1981).
12. Kohl, P.A., Wolowodiuk, and Ostermayer, F.W., Jr., "The Photoelectrochemical Oxidation of (100), (111) and (111) n-InP and n-GaAs," *Journal of the Electrochemical Society*, 130, 2288-2293 (1983).
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15. Forrest, S.R., Kohl, P.A., Panock, R., DeWinter, J.W., Nahory, R.E., and Yanowski, E., "A Long-wavelength, Annular In_{0.53}Ga_{0.47}As, p-i-n Photodector," *IEEE Electron Device Letters*, EDL-3, 415-417 (1982).

16. Ostermayer, F.W., Kohl, P.A., and Burton, R.H., "Photoelectrochemical Etching of Integral Lenses on InP/InGaAsP LEDs," *Applied Physics Letters*, 43, 642-644 (1983).
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35. Hodge, T.C., Landmann, B., Kohl, P.A., and Bidstrup, S.A., "Rapid Thermal Curing of Polymer Interlayer Dielectrics," *International Journal of Microcircuits & Electronic Packaging*, 17, 10-20 (1994).
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89. Park, S. H., Winnick, J. and Kohl, P. A., "Stability of Sodium Couple in Organic and Inorganic Molten Salt Electrolytes Investigated with Electrochemical Quartz Crystal Microbalance," *Journal of The Electrochemical Society*, accepted December 2000.
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95. Li, J., Murphy, E., Winnick, J., and Kohl, P.A., "The Effects of Pulse Charging on Cycling Characteristics of Commercial Lithium Ion Batteries", Journal of Power Sources.
96. Bhusari, D., Reed, H., Wedlake, M., Padovani, A., Bidstrup-Allen, S. A., Kohl, P. A., "Fabrication of Air-Channel Structures for Microfluidic, Microelectromechanical and Microelectronic Applications", Journal of Microelectromechanical Systems, 2001.
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103. Fansworth, K. D., Manepalli, R. N., Allen, S. A., and Kohl, P. A., "Variable Frequency Curing of Photosensitive Polyimides", IEEE Components and Packaging Technologies, **24**, 474-481 (2001).
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Conference Presentations without Proceedings

1. Kohl, P.A. and Bard, A.J., "The Photoelectrochemical Behavior of n and p-GaAs and InP Electrodes in Acetonitrile Solutions," Electrochemical Society, Seattle WA, 1978.
2. Noufi, R.N., Kohl, P.A., Rogers, J.W., White, J.M., and Bard, A.J., "Investigation of S/Se Substitution in Single Crystal and Polycrystalline CdSe and CDS Photoelectrodes by Photoelectron Spectroscopy," The Electrochemical Society, Seattle, WA, 1979.
3. Kohl, P.A. and Ostermayer, F.W., "The High Speed Electrodeposition of Tin, Lead and Their Alloys," The Electrochemical Society, Hollywood, FL, 1980.
4. Kohl, P.A. and Ostermayer, F.W., "Photoelectrochemical Decomposition of p-Type III-V Semiconductors," The Electrochemical Society, Hollywood, FL, 1980.
5. Ostermayer, F.W., and Kohl, P.A., "Photoelectrochemical Etching of p-GaAs," The Electrochemical Society, Hollywood, FL, 1980.
6. Kohl, P.A., "Photoelectrochemical Processing of III-V Semiconductor Devices," 187 Meeting American Chemical Society, St. Louis, MO, 1984.

7. Kohl, P.A., "Factors Effecting the PEC Etching of Submicron Features," Electrochemical Society, Las Vegas, NV, 1985.
8. Kohl, P.A., and Wagner, R.S., "Thin Film Analytical Techniques for VLSI Development," Invited lecture series, VLSI Conference, Taiwan, 1987.
9. Sheng, T.T., Malm, D.L., Hofstatter, E.A., and Kohl, P.A., "Cross-Sectional Transmission Electron Microscopy and Secondary Ion Mass Spectroscopy of MOS Devices," IEEE Conference on VLSI Devices, Shanghai, 1989.
10. Kohl, P.A., Harris, D.B., and Winnick, J., "The PEC etching of P-InP," SOTAPOCS XIII, Electrochemical Society Meeting, Seattle, WA, October 1990.
11. Kohl, P.A., "Multi-Chip Modules and Modern Manufacturing Practices," IPC Conference on Electronic Packaging, Atlanta, Ga, 1991.
12. Harris, D.B., Propst, E.K., Vogt, K., and Kohl, P.A., "The Photoelectrochemical Etching of Small Bandgap Semiconductors," Electrochemical Society, Washington, DC May 1991
13. Harris, D.B., Winnick, J., and Kohl, P.A., "The Effect of Cation on the Performance of the Cadmium Chalcogenide/Polysulfide Photoelectrochemical Cell," The Electrochemical Society, Washington DC, May 1991.
14. Li, H., Muzzy, J., Kohl, P., "Surface Polymerization of Xylene Derivatives on Carbon Fiber Electrodes," American Institute of Chemical Engineers National Meeting, Los Angeles, CA, November, 1991.
15. Propst, E., and Kohl, P.A., "The Photoelectrochemical Processing of Small Bandgap p-Type and n-Type Semiconductors," American Institute of Chemical Engineers National Meeting, Los Angeles, CA, November 1991.
16. Kohl, P.A., Hertling, D., and Bidstrup, S.A. "Low Dielectric Constant Insulators for Electronic Packaging," Physical Packaging Conference of the Defense Advanced Research Projects Agency, Washington DC, February 1992.
17. Vogt, K.W., and Kohl, P.A., "Thin Titanium Oxide Adhesion Layers on Gold: Morphology, Composition and Resistivity," Materials Research Society, Palo Alto, CA, Spring 1993.

18. Vogt, K.W., and Kohl, P.A., "Low Temperature Deposition of Group III and Transition Metal Nitride Films," Materials Research Society, Palo Alto, CA, Spring 1993.
19. Sinno, B. Bidstrup, S.A., and Kohl, P.A., "Characterization of Polymer Dielectrics for Use in Low Temperature Electronic Applications," Materials Research Society, Palo Alto, CA, Spring 1993.
20. Kohl, P.A., "Metallurgy and Processing for Advanced Mixed Mode Electronic Packaging," Invited presentation to the Defense Sciences research Council, July 8, 1993.
21. Twyford, E.J., Kohl, P.A., Jokerst, N.M., Hartman, N.F., "The Resolution of Holographic Etching of Gratings," The Electrochemical Society, Phoenix, AZ, October 1991.
22. Propst, E., Harris, D.B., and Kohl, P.A., "The Photoelectrochemical Etching of n-GaSb and n-InAs," The Electrochemical Society, Phoenix AZ, 1991.
23. Vogt, K., and Kohl, P.A., "Low Temperature Chemical Vapor Deposition of Group III and Transition Metal Nitride Films," American Institute of Chemical Engineers National Meeting, November 1992.
24. Gray, G.E., Winnick, J., and Kohl, P.A., "A Room Temperature Molten Salt Electrolyte For The Sodium/Iron Chloride Battery" *IECEC Energy Conversion Engineering Conference*, 44, 1139, Atlanta, GA, August 1993.
25. Frye, D.C., Harris, R.H., Heistrand, R.H., Moyer, E.S., Rutter, E.W., Garroü, P., Berry, M.J., Rogers, B., Turlik, I., Bidstrup, S.A., Hodge, T., Kohl, P.A., Taylor, G., Berry, K., David, F., and Lanka, M., "Via Generation in Cytclotene," VLSI Packaging, Kyoto, Japan December 2, 1992.
26. Hodge, T., Bidstrup, S.A., and Kohl, P.A., "The Effect of Moisture and Temperature on the Dielectric Properties of Polyimides," *The Electrochemical Society*, vol. 93-12, 451-2, St. Louis, MO, October 1992.
27. Han, S.S., Ceiler, M., Bidstrup, S.A., Kohl, P.A., May, G., "Em.perical Modeling of Plasma Enhanced CVD of Silicon Dioxide Using Neural Networks," SPIE Conf. on Microelectronics, Monterey, CA, Sept. 1993.
28. Hodge, T.C., Kohl, P.A., Bidstrup, S.A., Lee, J.B., Allen, M.G., "An In-Situ Measurement Technique for Through-Plane Thermal Properties of Thin Films," AICHE, St. Louis, MO, November 11, 1993.

29. Sullivan, A., Patel, A.J., and Kohl, P.A. "Low pH Electroless Gold," Plating and Surface Finishing, April 1994.
30. Sullivan, A., Patel, A.J., and Kohl, P.A. "Low pH Electroless Gold Deposition from Gold Thiosulphate," Electrochemical Society, San Francisco, CA, May 1994.
31. Kokan, J.R., Tadayan, F., Gerhardt, R., and Kohl, P.A. "Sol-Gel Processing of Porous Silica Thin Films," 98th Meeting of the American Ceramic Society, Indianapolis, Indiana, 1994.
32. Gray, G., Kohl, P.A., and Winnick, J., "Room Temperature Molten Salt Battery," The Electrochemical Society, Miami, FL, October 1994.
33. Rieger, M.M., Kohl, P.A., "Luminescence of Porous Silicon Formed in Acetonitrile," The Electrochemical Society, Miami, FL, October 1994.
34. K, J., Gerhardt, R., and Kohl, P.A., "Porous Silica," NATO conference, 1994.
35. Stalder, S.M., Ding, Y., Sturrock, P.E., Winnick, J., Kohl, P.A., and Bottomley, L.A., "A Continuous On-line Process Stream Monitor for the Electrolytic Production of Sodium Hydrosulfite," American Chemical Society, Analytical Chemistry Division, 1994.
36. Rieger, M.M., and Kohl, P.A., "Formation of Porous Silicon," Materials Research Society, Boston, MA, November 1994.
37. Pye, S.L., Winnick, J., and Kohl, P.A., "The Electrochemical Behavior of Copper and Nickel Electrodes in Sodium Chloride Buffered, Neutral Room Temperature Aluminum Chloride 1-Methyl-3-Ethyl Imidazolium Chloride Molten Salt," 189th Meeting of the Electrochemical Society, Los Angeles, CA, May 1996.
38. Pye, S.L., Gray, G.E., Winnick, J., and Kohl, P.A., "Room Temperature Molten Salts: Applications as Battery Electrolytes," 189th Meeting of the Electrochemical Society, Los Angeles, CA, May 1996.
39. Gray, G.E., Winnick, J., and Kohl, P.A., "Comparisons of the Plating and Stripping of Sodium from Room Temperature Molten Salts," 189th Meeting of the Electrochemical Society, Los Angeles, CA, May 1996.
40. Rieger, M.M., Flake, J., and Kohl, P.A., "A Photoelectrochemical Process for Fabricating Three--Dimensional Structures in Silicon," AIChE, November 1996.

41. Rieger, M.M., Flake, J., and Kohl, P.A., "The Elimination of Hydrogen Fluoride from the Electrochemical Etching of Silicon," AIChE, November 1996.
42. Scott, L.L., Bottomley, L.A., Kohl, P.A., and Winnick, J., "Electrochemical Manufacture of Sodium Dithionite," AIChE, November 1996.
43. Kohl, P. A., " Low k Dielectrics for High Speed Interconnections in Microelectronics," Invited Speaker, American Chemical Society, National Meeting, Anaheim, CA, March 22, 1999.
44. Allen, and Kohl, P. A., "Dielectric Materials, Characterization and Processing for Electronic Packaging," Second International Conference on Next Generation of Microelectronic packaging Research and Education, March 17-19, 1999.
45. Park, S., Winnick, J., and Kohl, P. A., "New Inorganic Based Electrolyte for Ambient Temperature Battery," ECS, Seattle, WA, May 1999.
46. Martin, K. P., Patel, C. S., Kohl, P. A., Ogitani, S., and Meindl, J., "Impact of Compliant Wafer Level Packaging into the Next Millennium," Semicon West, July 15, 1999.

Curriculum Vitae

L. Rafael Reif, Ph.D.

MASSACHUSETTS INSTITUTE OF TECHNOLOGY

School of Engineering Faculty Personnel Record

Full Name: L. Rafael Reif
Department: Electrical Engineering
and Computer Science

Date of Birth: August 21, 1950

Citizenship: U.S.

Education:

| <u>School</u> | <u>Degree</u> | <u>Date</u> |
|--|------------------------|-------------|
| Universidad de Carabobo (Venezuela) | Ingeniero Electrico | Sept. 1973 |
| Stanford University | M.S. | Oct. 1975 |
| Stanford University | Ph.D. | Jan. 1979 |

Title of Thesis for Most Advanced Degree:

Doping Process in Silicon Epitaxy: Transfer Function and Physicochemical Model

Principal Fields of Interest:

Integrated circuit fabrication technology

Non-M.I.T. Experience :

| <u>Employer</u> | <u>Position</u> | <u>Beginning</u> | <u>Ending</u> |
|----------------------------------|------------------|------------------|---------------|
| MCM Electronica (Venezuela) | Engineer | Apr. 1973 | June 1973 |
| Universidad Simon Bolivar (Ven.) | Asst. Prof. | July 1973 | July 1974 |
| Stanford University | Vis. Asst. Prof. | Nov. 1978 | Dec. 1979 |

History of M.I.T. Appointments:

| <u>Rank</u> | <u>Beginning</u> | <u>Ending</u> |
|--|------------------|---------------|
| Assistant Professor | Jan. 1980 | June 1983 |
| Analog Devices Career Dev. Asst. Prof. | July 1980 | June 1982 |
| Associate Professor (without tenure) | July 1983 | June 1985 |
| Associate Professor (with tenure) | July 1985 | June 1988 |

Professor
Microsystems Technology Laboratories,
Director
Department of Electrical Engineering and
Computer Science, Associate Head

July 1988 —
Sept. 1990 Jan. 1999

Jan. 1999 —

Consulting Record:

| <u>Firm</u> | <u>Beginning</u> | <u>Ending</u> |
|--|------------------|---------------|
| Lincoln Laboratory | May 1980 | Sept. 1983 |
| SPIRE Corp. | Nov. 1981 | Nov. 1983 |
| Infrared Industries | Feb. 1982 | |
| Digital Equipment Corp. | Aug. 1983 | Oct. 1997 |
| Massachusetts Technology Park Corp. | Aug. 1983 | Feb. 1984 |
| Union Carbide | Dec. 1983 | |
| Inter-American Development Bank | Jan. 1984 | Jan. 1988 |
| Aerodyne Research | Feb. 1984 | Dec. 1987 |
| Tylan Corp. | Feb. 1984 | |
| General Motors Research Labs | Nov. 1984 | Dec. 1987 |
| M/A Com | July 1985 | |
| Luxembourg, Ministere des Affaires Etrangeres | Nov. 1985 | Nov. 1988 |
| Princeton Scientific Consultants | Mar. 1986 | Dec. 1989 |
| Advantage Corp. | Feb. 1987 | Dec. 1990 |
| Intel Corp. | Jan. 1988 | |
| Matheson Gas Products | Sept. 1988 | |
| General Electric Company | July 1989 | |
| Applied Materials | Aug. 1994 | — |
| Science Research Lab. | March 1994 | Aug. 1995 |
| Varian Ion Implant Systems | Sept. 1995 | Dec. 1995 |
| U.S. Venture Partners | Dec. 1995 | |
| Morrison & Foerster | April 1996 | Jan. 1997 |
| SemiTest, Inc. | June 1996 | Feb. 1999 |
| Texas Instruments | Aug. 1996 | Nov. 1996 |
| Neo Ram | Aug. 1996 | Aug. 1999 |
| Aplex, Inc. | Jan. 1997 | March 1999 |
| Watkins Johnson | Aug. 1997 | Dec. 1997 |
| Texas Instruments | Nov. 1997 | March 1999 |
| Siemens Corp./Infineon Technologies | March 1998 | December 2000 |
| Atmel Corporation | June 1998 | July 1998 |
| Semiconductor Energy Laboratory | January 1999 | — |
| Intel Corporation | August 1999 | |
| UTAR Corporation | October 1999 | December 2000 |
| Micron Technology | February 2000 | December 2000 |
| SGS-Thomson Microelectronics | December 2000 | February 2001 |
| Booz Allen & Hamilton Inc. | April 2001 | May 2001 |

Government Committees, Service, etc.:

Beginning Ending

| | | |
|---|------------|------------|
| National Science Foundation, Washington, DC, Ceramics and Electronic Materials/Solid State and Microstructures Small Business Initiated Research Program | Sept. 1985 | |
| NSF Engineering Research Center for Advanced Materials Processing, North Carolina State University, Raleigh, NC, Site Visit Team | June 1993 | |
| Massachusetts Semiconductor Industry Task Force | June 1993 | June 1997 |
| Sandia National Laboratories, Center for Microelectronics, Status Review | Feb. 1994 | |
| National Advisory Committee on Semiconductors, Ad Hoc Working Group on University Affairs | May 1990 | Dec. 1990 |
| NSF Engineering Research Center Pre-Proposal Review Team, Washington, DC | March 1995 | |
| National Nanofabrication Users Network, Governing Board | March 1995 | March 1998 |
| The Hong Kong University of Science and Technology, Advisory Committee, Dept. of Electrical, Electronics, and Computer Eng. | May 1995 | May 2001 |
| Semiconductor Research Corporation University Advisory Committee | Dec. 1995 | Dec. 1998 |
| Semiconductor Industry Association (SIA) Technology Strategy Committee | Jan. 1996 | Jan. 1997 |
| The Alan T. Waterman Award Committee, National Science Foundation | May 1996 | May 1999 |
| Semiconductor Research Corporation Infrastructure Task Force | Feb. 1998 | May 1999 |
| Semiconductor Research Corporation Undergraduate Scholarship Working Group | Jan. 1999 | May 1999 |
| Wearable Information Network Association | Aug. 2000 | — |

Editorial Board for

| | | |
|---------------------------------|-----------|-----------|
| Journal of Electronic Materials | Jan. 1986 | June 1989 |
|---------------------------------|-----------|-----------|

Organizing Committee for:

| | | |
|--|-----------|-----------|
| Workshop on the Interaction of Laser Radiation with Surfaces for Application to Microelectronics, MIT, Cambridge, MA | July 1980 | May 1981 |
| 1983 Electronic Materials Conference, Burlington, Vermont | Oct. 1982 | June 1983 |
| Fourth European Conference on Chemical Vapor Deposition, Eindhoven, The Netherlands | May 1983 | June 1983 |
| ECS Ninth International Conference on Chemical Vapor Deposition, Cincinnati, Ohio | May 1983 | May 1984 |
| ECS Third International Symposium on VLSI Science and Technology, Toronto, Canada | May 1983 | May 1985 |
| 1984 Electronic Materials Conference, Santa Barbara, California | Oct. 1983 | June 1984 |
| ECS Fifth International Symposium on Silicon | Jan. 1984 | May 1986 |

| | | |
|--|------------|------------|
| Materials Science and Technology, Boston, MA | | |
| ECS Symposium on Reduced Temperature Processing for VLSI, <i>Co-Chairman</i> , Las Vegas, Nevada | May 1984 | Oct. 1985 |
| 1985 Electronic Materials Conference, Boulder, Colorado | Oct. 1984 | June 1985 |
| International Electron Devices Meeting, Washington, DC | Mar. 1985 | Dec. 1985 |
| 1986 Electronic Materials Conference, Amherst, MA | Oct. 1985 | June 1986 |
| ECS First International Symposium on ULSI, Philadelphia, PA | Oct. 1985 | May 1987 |
| 1986 Semicon/East Technical Program, Boston, MA | Jan. 1986 | Sept. 1986 |
| 1987 Semicon/East Technical Program, Chairman, Boston, MA | Sept. 1986 | Sept. 1987 |
| 1987 Electronic Materials Conference, Santa Barbara, CA | Oct. 1986 | June 1987 |
| ECS Tenth International Conference on Chemical Vapor Deposition, Honolulu, Hawaii | Oct. 1986 | Oct. 1987 |
| ECS First International Symposium on Advanced Materials for ULSI, <i>Co-Chairman</i> , Atlanta, GA | Oct. 1986 | May 1988 |
| SRC Topical Research Conference on BiCMOS, <i>Co-Chairman</i> , MIT, Cambridge, MA | Sept. 1987 | Dec. 1987 |
| 1988 Electronic Materials Conference | Oct. 1987 | June 1988 |
| Symposium on Novel Processing Technologies for Electronic Materials, <i>Chairman</i> , MIT, Cambridge, MA | Nov. 1987 | Nov. 1988 |
| IEEE Workshop on BiCMOS Circuits and Technology, <i>Co-Chairman</i> , New York, NY | Feb. 1988 | Feb. 1989 |
| 1989 Electronics Materials Conference, MIT, Cambridge, MA | Oct. 1988 | June 1989 |
| SRC Topical Research Conference on Si-based Epitaxial Technologies, <i>Chairman</i> , MIT, Cambridge, MA | Sept. 1988 | Sept. 1989 |
| MRS Symposium on Low Temperature Si and Si-based Epitaxial Structures: Electrical Properties and Defects, <i>Co-Chairman</i> , Anaheim, CA | Feb. 1989 | Feb. 1990 |
| IEEE 1990 VLSI Technology Symposium, Honolulu, Hawaii | June 1989 | June 1990 |
| IEEE/SEMI Advanced Semiconductor Manufacturing Conference and Workshop, Boston, MA | Sept. 1989 | Sept. 1990 |
| IEEE 1991 VLSI Technology Symposium, Oiso, Kanagawa, Japan | June 1990 | June 1991 |
| IEEE 1992 VLSI Technology Symposium, Seattle, Washington | June 1991 | June 1992 |
| IEEE 1993 VLSI Technology Symposium, Kyoto, Japan | June 1992 | June 1993 |
| IEEE 1993 VLSI Technology Workshop, <i>Co-Chairman</i> , Kyoto, Japan | June 1992 | June 1993 |
| IEEE 1994 VLSI Technology Symposium, Honolulu, Hawaii | June 1993 | June 1994 |
| IEEE 1994 VLSI Technology Workshop, <i>Chairman</i> Honolulu, Hawaii | June 1993 | June 1994 |

| | | |
|---|------------------------|--------------------|
| IEEE 1994 Bipolar/BiCMOS Circuits and Technology Meeting, Minneapolis, Minnesota | Oct. 1993 | Oct. 1994 |
| Miniaturization Research Committee of Foundation Advanced Technology Institute, Japan (Advisor) | Oct. 1993 | Oct. 1995 |
| TMS 1994 Electronic Materials Conference, Boulder, Colorado | Oct. 1993 | June 1994 |
| IEEE Tencon '95, Hong Kong, International Advisory Committee | Nov. 1993 | Nov. 1995 |
| IEEE 1995 VLSI Technology Symposium Kyoto, Japan | June 1994 | June 1995 |
| TMS 1995 Electronic Materials Conference, Charlottesville, Virginia (session chair) | Oct. 1994 | June 1995 |
| 1996 MRS Symposium on "Environment, Safety and Health Issues in IC-production", Co-chairman, Boston, MA | Sept. 1995 | Nov. 1996 |
| Topical Workshop: "Economic and Technical Issues in Optimizing Plasma Processes to Minimize Environment, Safety and Health Impacts", Co-organizer and Session Moderator | | July 1996 |
| IEEE 1996 VLSI Technology Symposium EHS Program Committee | June 1995 July 1998 | June 1996 _____ |

Panelist:

| | |
|---|------------|
| Microelectronics Center of North Carolina, "Low Thermal Budget Processing" | Oct. 1985 |
| Workshop on Foreign Participation in the SRC, Raleigh, NC | June 1990 |
| IEEE 1990 Symposium on VLSI Technology, "Si Film and Substrate Technologies", Honolulu, Hawaii | June 1990 |
| University of California/Los Angeles, SRC Topical Research Conference on Integration of Novel Processes | April 1991 |
| IEEE 1993 VLSI Technology Symposium, "Surface Control for ULSI," Kyoto, Japan | May 1993 |
| NSF Workshop on Materials for Future Electronics and Optoelectronics | Oct. 1993 |
| Sematech President's Day, Dallas, TX | April 1996 |

Discussion Leader:

| | |
|--|-----------|
| 1984 Gordon Research Conference on "Thin Films and Solid Surfaces" | July 1984 |
| 1987 Gordon Research Conference on "Chemistry and Physics of Coatings and Films" | Aug. 1987 |

Awards Received:

| <u>Award</u> | <u>Date</u> |
|---|-------------|
| Scholarship (Sears Foundation, Venezuela) | 1969-1973 |
| Outstanding Scholastic Performance (U. de Carabobo) | 1973 |
| Fellowship (Universidad Simon Bolivar) | 1974-1978 |
| IEEE Fellow | 1993 |
| 1998 SRC Inventor Recognition Award | 1998 |
| 2000 SRC Aristotle Award | 2000 |

Current Organization Membership:

| <u>Organization</u> | <u>Offices Held</u> |
|--|--|
| Electrochemical Society | |
| VLSI Processing Subcommittee of the Electronics Division | Member, May 1983 - May 1985 |
| ULSI Processing Subcommittee of the Electronics Division | Member, May 1985 - May 1987 |
| Symposia Planning Committee of the Electronics Division | Member, May 1983 - May 1985 |
| Technical Planning Committee of the Electronics Division | Member, May 1985 - May 1987 |
| Executive Committee of the Electronics Division | Consultant, May 1984 - May 1985 Member-at-large, May 1985 - May 1991 Member, May 1993 - May 1995 Member-at-Large, May 1995-May 1997 Member-at-Large, May 1997-May 1999 |
| Metallurgical Society of AIME | |
| Electronic Materials Committee | Member, Mar. 1984 - June 1985 Assistant Treasurer, June 1985 - June 1987 Treasurer, June 1987 - June 1989 Symposium on VLSI Technology, Committee Officer, June 1992-1996 |
| IEEE | |
| American Physical Society | |
| Materials Research Society | |
| American Association for the Advancement of Science | |
| Tau Beta Pi | |

Patents and Patent Applications Pending:

1. R. Reif, T.J. Donahue, and W.R. Burger, "Growth of Epitaxial Films by Chemical Vapor Deposition Utilizing a Surface Cleaning Step Immediately Before Deposition," U.S. Patent Number 4,579,609, April 1, 1986.
2. R. Reif and C.G. Fonstad, "Growth of Epitaxial Films by Plasma Enhanced Chemical Vapor Deposition (PE-CVD)," U.S. Patent Number 4,659,401, April 21, 1987.
3. R. Reif, P.K. Tedrow, and V. Ilderem, "Low Pressure Chemical Vapor Deposition of Refractory Metal Silicides," U.S. Patent Number 4,668,530, May 26, 1987.
4. R. Reif, C.G. Fonstad, and A.D. Huelsman, "Growth of Epitaxial Films by Chemical Vapor Deposition," U.S. Patent Number 4,773,355, September 27, 1988.
5. V. Ilderem, R. Reif, and P.K. Tedrow, "Very Low Pressure Chemical Vapor Deposition Process for Deposition of Titanium Silicide Films," U.S. Patent Number 4,957,777, September 18, 1990.
6. K.K. O, H-S. Lee, and R. Reif, "Merged Bipolar and Insulated Gate Transistors," U.S. Patent Number 5,028,977, July 2, 1991.
7. T. Noguchi, R. Reif, J.A. Tsai, and A. J. Tang, "High Performance Poly SiGe Thin Film Transistor", U.S. Patent Number 5,828,084, October 27, 1998.
8. S. Karecki, L. Pruette, and R. Reif, "Use of Non-Perfluoro Fluorocarbons for Etching and Cleaning", filed December 4, 1998 (provisional application filed December 4, 1997).
9. N. Yamauchi, J-J. J. Hajjar, and R. Reif, "Thin Film Transistor," Serial Number 07/367, 446, Filed on June 16, 1989.

Teaching Experience of L. Rafael Reif

| <u>Term</u> | <u>Subject Number</u> | <u>Title</u> | <u>Role</u> |
|-------------------------------------|-----------------------------------|--|--|
| At Universidad Simon Bolivar | | | |
| SSQ73 | | Electronic Circuits II | Lectures, in charge |
| FQ73 | | Electronic Circuits II | Lectures, in charge |
| WQ74 | | Electronic Circuits III | Lectures, in charge |
| SPQ74 | | Electronic Circuits IV | Lectures, in charge |
| At MIT | | | |
| IAP80 | 6.151J (NEW) | Semiconductor Dev. Proj. Lab. | Development |
| ST80 | 6.151J | Semiconductor Dev. Proj. Lab. | Lectures |
| FT80 | 6.151J | Semiconductor Dev. Proj. Lab. | Lectures |
| ST81 | 6.151J | Semiconductor Dev. Proj. Lab. | Lectures |
| FT81 | 6.774 (NEW) | Integrated Circuit Fabrication Technology | Lectures, in charge development |
| IAP82 | 6.150J (NEW) | Introduction to Microelectronics Technology | Lectures, in charge development |
| ST82 | 6.150J | Introduction to Microelectronics Technology | Lectures, in charge |
| | 6.151 | Semiconductor Dev. Proj. Lab. | Lectures (part) |
| FT82 | 6.774 | Integrated Circuit Fabrication Technology | Lectures, in charge |
| IAP83 | 6.150J | Introduction to Microelectronics Technology | Lectures, in charge |
| ST83 | 6.151 6.770 6.776J (NEW) | Semiconductor Dev. Proj. Lab. Microelectronics Proj. Lab. Plasma Processing in Integrated Circuit Fabrication | Lectures (part), in charge Lectures, in charge Lectures (part), co-in charge, development |
| SS83 | 10.61s | Plasma Processing for Micro- electronic Fabrication | Lectures, co-in charge |
| FT83 | 6.774 | Physics of Microelectronic Fabrication | Lectures, in charge |

| | | | |
|------|--------|---|-------------------------|
| ST84 | 6.012 | Electronic Devices and Circuits | Recitation (2 sections) |
| SS84 | 10.61s | Plasma Processing for Micro-electronic Fabrication | Lectures, co-in charge |
| FT84 | 6.774 | Physics of Microelectronic Fabrication | Lectures, in charge |
| ST85 | 6.776J | Plasma Processing in Integrated Circuit Fabrication | Lectures, co-in charge |
| SS85 | 10.61s | Plasma Processing for Microelectronic Fabrication | Lectures, co-in charge |
| FT85 | 6.774 | Physics of Microelectronic Fabrication | Lectures, in charge |
| ST86 | 6.002 | Circuits and Electronics | Recitation (2 sections) |
| SS86 | 10.61s | Plasma Processing for Microelectronic Fabrication | Lectures, co-in charge |
| FT86 | 6.774 | Physics of Microelectronic Fabrication | Lectures, in charge |
| ST87 | 6.776J | Plasma Processing in Integrated Circuit Fabrication | Lectures, co-in charge |
| SS87 | 10.61s | Plasma Processing for Microelectronic Fabrication | Lectures, co-in charge |
| FT87 | 6.774 | Physics of Microelectronic Fabrication | Lectures, in charge |
| SS88 | 10.61s | Plasma Processing for Microelectronic Fabrication | Lectures, co-in charge |
| FT88 | 6.774 | Physics of Microelectronic Fabrication | Lectures, co-in charge |
| ST89 | 6.776J | Plasma Processing in Integrated Circuit Fabrication | Lectures, co-in charge |
| SS89 | 10.61s | Plasma Processing for Microelectronic Fabrication | Lectures, co-in charge |
| FT89 | 6.774 | Physics of Microelectronic Fabrication | Lectures, in charge |
| SS90 | 10.61s | Plasma Processing for Microelectronic Fabrication | Lectures, co-in charge |

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|------|--------|--|------------------------|
| FT90 | 6.774 | Physics of Microelectronic Fabrication | Lectures, in charge |
| ST91 | 6.776J | Plasma Processing in Integrated Circuit Fabrication | Lectures, co-in charge |
| SS91 | 10.61s | Plasma Processing for Microelectronic Fabrication | Lectures, co-in charge |

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| FT91 | 6.774 | Physics of Microelectronic Fabrication | Lectures, in charge |
| SS92 | 10.61s | Plasma Processing for Microelectronic Fabrication | Lectures, co-in charge |
| FT92 | 6.774 | Physics of Microelectronic Fabrication | Lectures, in charge |
| ST93 | 6.776J | Plasma Processing in Integrated Circuit Technology | Lectures, co-in charge |
| SS93 | 10.61s | Plasma Processing for Microelectronic Fabrication | Lectures, co-in charge |
| FT93 | 6.774 | Physics of Microelectronic Fabrication | Lectures, in charge |
| SS94 | 10.61s | Plasma Processing for Microelectronic Fabrication | Lectures, co-in charge |
| FT94 | 6.774 | Physics of Microelectronic Fabrication | Lectures, in charge |
| ST95 | 6.776J | Plasma Processing in Integrated Circuit Technology | Lectures, co-in charge |
| SS95 | 10.61s | Plasma Processing for Microelectronic Fabrication | Lectures, co-in charge |
| FT95 | 6.774 | Physics of Microelectronic Fabrication | Lectures, in charge |
| ST96 | 6.012 | Electronic Devices and Circuits | Recitation (1 section) |
| SS96 | 6.74s (NEW) | Multilevel Interconnect Process Technologies for Microelectronics Fabrication | Lectures, in charge, development |
| FT96 | 6.973 (NEW) | Physics of Microelectronic Fabrication: Back End Processing | Lectures, in charge, development |
| SS97 | 6.74s | Multilevel Interconnect Process Technologies for Microelectronics Fabrication | Lectures, in charge, |
| FT97 | 6.774 | Physics of Microelectronic Fabrication | Lectures, in charge |
| SS98 | 6.74s | Multilevel Interconnect Process Technologies for Microelectronics Fabrication | Lectures, in charge, |

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|------|-------|---|----------------------|
| SS99 | 6.74s | Multilevel Interconnect Process Technologies for Microelectronics Fabrication | Lectures, in charge, |
| SS00 | 6.74s | Multilevel Interconnect Process Technologies for Microelectronics Fabrication | Lectures, in charge, |

Other Teaching Experience

"Applied Materials Technology," offered at Materials Processing Center, MIT, Cambridge, MA by IBM. In charge of four 1.5-hour sessions, June 20 - July 1, 1983.

"Physics of Microfabrication," offered by Digital Equipment Corporation, Hudson, MA. In charge of five all-day sessions, from 8:30-4:00, August 22-26, 1983.

"Applied Materials Technology," Course 3.07s by Summer Session Program, MIT, Cambridge, MA. In charge of two 1.5-hour sessions, June 11-22, 1984.

"Physics of Microelectronic Fabrication," offered by Digital Equipment Corporation, Hudson, MA. In charge of five all-day sessions, from 8:30-4:00, July 30-August 3, 1984.

"Plasma Processing for Microelectronic Fabrication," offered by Digital Equipment Corporation, Hudson, MA. Co-in charge of five all-day sessions, from 8:30-4:00, March 25-29, 1985.

"Applied Materials Technology," Course 3.07s by Summer Session Program, MIT, Cambridge, MA. In charge of two 1.5-hour sessions, June 10-21, 1985.

"Physics of Microfabrication," offered by Digital Equipment Corporation, Hudson, MA. In charge of five all-day sessions, from 8:30-4:00, August 26-30, 1985.

"Plasma Processing for Microelectronic Fabrication," offered by Digital Equipment Corporation, Hudson, MA. Co-in charge of five all-day sessions, from 8:30-4:00, March 24-28, 1986.

"Plasma Enhanced Chemical Vapor Deposition of Thin Films for Microelectronics," offered by Materials Research Society. In charge of one all-day session, from 8:30-4:00, April 18, 1986, Palo Alto, CA.

"Plasma Processing," offered by IBM Corp., Thornwood, NY. In charge of one 1.5-hour session, July 21, 1986.

"Physics of Microfabrication," offered by Digital Equipment Corporation, Hudson, MA. In charge of five all-day sessions, 8:30-4:00, August 25-29, 1986.

"CVD and Plasma Enhanced CVD," offered by Princeton Scientific Consultants, Inc. In charge of one half-day session, 9:00-12:00, October 2, 1986, Princeton, NJ.

"Plasma Enhanced Chemical Vapor Deposition of Thin Films for Microelectronics," offered by Materials Research Society. In charge of one all-day session, 8:30-4:00, December 5, 1986, Boston, MA.

"Silicon Epitaxy for VLSI," offered by U.C. Berkeley. In charge of two 1.5-hour sessions, February 3, 1987, Palo Alto, CA.

"Plasma Enhanced Chemical Vapor Deposition of Thin Films for Microelectronics," offered by Materials Research Society. In charge of one all-day session, 8:30 - 4:00, April 24, 1987, Anaheim, CA.

"CVD and Plasma Enhanced CVD," offered by Princeton Scientific Consultants, Inc. In charge of one half-day session, 1:00 - 5:00, June 8, 1987, Lambertville, NJ.

"Physics of Microfabrication," offered by Digital Equipment Corporation, Hudson, MA. In charge of five all-day sessions, August 24-28, 1987.

"Plasma Enhanced Chemical Vapor Deposition of Thin Films for Microelectronics," offered by Materials Research Society. In charge of one all-day session, 8:30-4:00, November 30, 1987, Boston, MA.

"Plasma Processing for Microelectronic Fabrication," offered by Intel Corp., Santa Clara, CA. Co-in charge of five all-day sessions, 8:30-4:00, January 1988.

"Silicon Epitaxy for VLSI," offered by U.C. Berkeley. In charge of three 1.5-hour sessions, August 4-5, 1988, Palo Alto, CA.

"CVD and Plasma Enhanced CVD," offered by Princeton Scientific Consultants, Inc. In charge of one half-day session, 1:00-5:00, November 14-16, 1988.

"Plasma Processing for Microelectronic Fabrication," offered by Digital Equipment Corporation, Hudson, MA. Co-in charge of five all-day sessions, 8:30-4:00, November 22-December 21, 1988.

"Plasma Enhanced Chemical Vapor Deposition of Thin Films for Microelectronics," offered by Materials Research Society. In charge of one all-day session, 8:30-4:00, December 2, 1988, Boston, MA.

"CVD and Plasma Enhanced CVD," offered by Princeton Scientific Consultants, Inc. In charge of one half-day session, 9:00-12:00, March 13-15, 1989, Princeton, NJ.

"Physics of Microfabrication," offered by Digital Equipment Corporation, Hudson, MA. In charge of five all-day sessions, 8:30-4:00, June 12-28, 1989.

"Plasma Processing for Microelectronic Fabrication," offered by Digital Equipment Corporation, Hudson, MA. Co-in charge of five all-day sessions, 8:30-4:00, November 16-22, 1989.

"Physics of Microfabrication," offered by Digital Equipment Corporation, Hudson, MA. In charge of twenty two-hour sessions, February 8-May 3, 1990.

"Plasma Processing for Microelectronic Fabrication," offered by Digital Equipment Corporation, Hudson, MA. Co-in charge of five all-day sessions, 8:30-4:00, February 13-22, 1991.

"Physics of Microfabrication," offered by Digital Equipment Corporation, Hudson, MA. In charge of five all-day sessions, 8:30-4:00, October 30 - November 8, 1991.

"Plasma Processing for Microelectronic Fabrication," offered by Intel Corp., Santa Clara, CA. Co-in charge of five all-day sessions, 8:30-4:00, July 1992.

"Physics of Microfabrication," offered by Digital Equipment Corporation, Hudson, MA. In charge of five all-day sessions, 8:30-4:00, November 29 - December 17, 1993.

"Defect Reduction and Yield" offered by Digital Equipment Corporation, Hudson, MA. In charge of five all-day sessions, 8:30-4:00, June 5-16, 1995.

"Defect Reduction and Yield" offered by Digital Equipment Corporation, Hudson, MA. In charge of five all-day sessions, 8:30-4:00, December 14-22, 1995.

"Defect Reduction and Yield" offered by Digital Equipment Corporation, Hudson, MA. In charge of five all-day sessions, 8:30-4:00, May 27-June 7, 1996.

"Multilevel Interconnect Process Technologies for Microelectronic Fabrication", offered by Intel Corporation, Rio Rancho, NM. In charge of five all-day sessions, 9:00-4:00, August 16-20, 1999.

"Plasma Etching for Silicon Microfabrication", offered by Chartered Semiconductor Mfg Ltd., Singapore. In charge of two all-day sessions, 9:00-4:00, July 17-18, 2000.

Publications of L. Rafael Reif

1. Books/Chapters

1. Reif, R. and G.R. Srinivasan, Editors, Proceedings of the Symposium on Reduced Temperature Processing for VLSI, Proceedings Volume 86-5, The Electrochem. Soc., Inc., Pennington, NJ, 1986.
2. Reif, R., "Low Temperature Processing for Silicon Microelectronics," Chapter in Advances in Electronic Materials, B.W. Wessels and G.Y. Chin, Editors, Amer. Soc. for Metals (ASM), Metals Park, Ohio, 1986, pp. 95-117.
3. Scott, M., Y. Akasaka, and R. Reif, Editors, Advanced Materials for ULSI, Proceedings Volume 88-19, The Electrochem. Soc., Inc., Pennington, NJ, 1988.
4. Reif, R., "Plasma Enhanced Chemical Vapor Deposition for Micro-electronics," Chapter in Handbook of Advanced Semiconductor Technology and Computer Systems, G. Rabbat, Editor, Van Nostrand Reinhold Co., New York, 1988, pp. 1-26.
5. Reif, R., "Plasma Enhanced Chemical Vapor Deposition of Thin Films for Microelectronics," Chapter in Handbook of Plasma Processing Technology, S.M. Rossnagel, J.J. Cuomo, and W.D. Westwood, Editors, Noyes Publications, N.J., 1990, pp. 260-284.
6. Reif, R. and W. Kern, "Plasma-Enhanced Chemical Vapor Deposition," Chapter in Thin Film Processes II, J.L. Vossen and W. Kern, Editors, Academic Press, San Diego, CA 1991, pp. 525-564.
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9. Tedrow, P.K. and R. Reif, "Plasma-Enhanced Chemical Vapor Deposition", Chapter in ASM Handbook in Surface Engineering, Volume 5, ASM International, 1994, pp. 532-537.
10. Green, M.L. and R. Reif, Editors, Special Issue on Low-Temperature Silicon Epitaxy, J. Electronic Materials, Volume 19, Oct. 1990.

11. Reif, R., M. Heyns, A. Bowling, and A. Tonti, Editors, Environmental, Safety, and Health Issues in IC Production, Materials Research Society Symposium Proceedings Volume 4-47, 1997.
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2. Papers in Refereed Journals

1. Reif, R., T.I. Kamins, and K.C. Saraswat, "Transient and Steady-State Response of the Dopant System of a Silicon Epitaxial Reactor: Transfer-Function Approach," J. Electrochem. Soc. 125, 1860-1866, Nov. 1978.
2. Reif, R., T.I. Kamins, and K.C. Saraswat, "A Model for Dopant Incorporation into Growing Silicon Epitaxial Films: I. Theory," J. Electrochem. Soc. 126, 644-652, April 1979.
3. Reif, R., T.I. Kamins, and K.C. Saraswat, "A Model for Dopant Incorporation into Growing Silicon Epitaxial Films: II. Comparison of Theory and Experiment," J. Electrochem. Soc. 126, 653-660, April 1979.
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5. Internal Memoranda and Progress Reports

6. Invited Lectures

July 1979, "Chemical Vapor Deposition of Epitaxial Silicon," Workshop on Computer Aids for IC Technology and Device Design, Stanford University, Stanford, CA.

September 1981, "Silicon Epitaxy and Thin Gate Dielectrics for VLSI," CNET, Centre de micro-electronique de Grenoble, Grenoble, France.

May 1982, "Thin Silicon Films for Microelectronic Applications," Industrial Liaison Symposium on Electronic Materials and Devices, MIT, Cambridge, MA.

May 1982, "Thin Silicon Films for Microelectronics," IBM, T.J. Watson Research Center, Yorktown Heights, NY.

July 1982, "Plasma Assisted CVD of Thin Silicon Films," US-German Workshop on Fundamental Problems in VLSI Processing, Munich, Germany.

July 1982, "Low Temperature Silicon-on-Insulator Technology," US-German Workshop on Fundamental Problems in VLSI Processing, Munich, Germany.

February 1983, "Thin Silicon Films for Microelectronic Applications," Digital Equipment Corporation, Hudson, MA.

April 1983, "Plasma Assisted Chemical Vapor Deposition of Thin Films for VLSI Applications," IEEE Meeting on Computers and Technology, Poughkeepsie, NY.

May 1983, "Low Temperature Epitaxial Deposition of Solid Silicon by Plasma Enhanced CVD," US Army Armament Research and Development Command, Dover, NJ.

June 1983, "Properties of Thin Polycrystalline Silicon Films Deposited by Plasma-Assisted CVD," Rheinisch-Westfalischen Tech. Hochschule, Aachen, W. Germany.

September 1983, "Requirements for Low Temperature Processing," Semicon/East Technical Program, Boston, MA.

November 1983, "Plasma Enhanced CVD of Silicon Epitaxy and Refractory Metal Silicides," Semiconductor Research Corporation, Deposition Processes Topical Research Conference, RPI Center for Integrated Electronics, Watervliet, NY.

December 1983, "Plasma Enhanced Chemical Vapor Deposition in Microelectronics," Union Carbide, Tarrytown, NY.

February 1984, "Low Temperature VLSI Processing and Process Modeling," Industrial Liaison Symposium on Electronic Materials Processing, MIT, Cambridge, MA.

March 1984, "Plasma Enhanced CVD of Thin Films," Symposium on Dry-Processing Science and Technologies, RCA Laboratories, Princeton, NJ.

September 1984, "Low Temperature Processing," ASM Materials Science Seminar on Advances in Electronic Materials, Detroit, MI.

November 1984, "Plasma Enhanced Chemical Vapor Deposition," New England Chapter of the American Vacuum Society, Burlington, VT.

November 1984, "Low Temperature Processing for VLSI," General Motors Research Laboratories, Warren, MI.

January 1985, "CVD of Si Epitaxy for VLSI," 1985 Advanced Semiconductor Equipment Exposition's Technical Conference on Manufacturing Science, San Jose, CA.

February 1985, "Low Temperature Silicon Epitaxy for VLSI," Texas Instruments Inc., Dallas, TX.

March 1985, "Very Low Pressure Chemical Vapor Deposition of Silicon Epitaxy and Titanium Silicide Films," GTE Laboratories Inc., Waltham, MA.

June 1985, "Plasma Enhanced Chemical Vapor Deposition of Silicon Epitaxial Films," 1985 IBM Plasma Symposium, Burlington, VT.

June 1985, "Plasma Enhanced Chemical Vapor Deposition of Low-Temperature Silicon Epitaxial Films," Annual Symposium of the New England Combined Chapter of the American Vacuum Society, Nashua, NH.

June 1985, "Very Low Pressure Chemical Vapor Deposition of Silicon Epitaxial Films," Whitney Symposium on Science and Technology VI, General Electric, Schenectady, NY.

December 1985, "Low Temperature Processing for Microelectronics," Symposium Diamonds in the Sand, Dedication of the G.S. Brown Building, MIT, Cambridge, MA.

January 1986, "Low Temperature Microelectronics Processing," MIT Industrial Liaison Symposium on Recent Advances in VLSI, Santa Clara, CA.

February, 1986, "Low Temperature Epitaxial Silicon Deposited by Plasma-Enhanced Chemical Vapor Deposition," Engineering Foundation Conference on Processing of Electronic Materials, Santa Barbara, CA.

March, 1986, "Low Temperature Silicon Epitaxy by Plasma Enhanced Chemical Vapor Deposition," IBM T.J. Watson Research Center, Yorktown Heights, NY.

April 1986, "Low Temperature Silicon Epitaxial Growth by Plasma Enhanced Chemical Vapor Deposition," AT&T Bell Laboratories, Murray Hill, NJ.

May 1986, "Novel Processing Technologies for VLSI," Eastman Kodak Research Laboratories, Rochester, NY

May 1987, "Recent Developments in Thin Film Technology Research," General Motors Research Laboratories, Warren, MI.

May 1987, "Processing of Thin Films for Microelectronics," Industrial Liaison Symposium on Surfaces and Interfaces, MIT, Cambridge, MA.

June 1987, "Recent Developments in Low Temperature Silicon Epitaxy by Plasma-CVD," Annual Symposium of the New England Combined Chapter of the American Vacuum Society, Newton, MA.

September 1987, "Plasma Enhanced Deposition of Epitaxial Si and GaAs," GTE Research Laboratories, Waltham, MA.

September 1987, "Plasma Enhanced Deposition of Epitaxial Si and GaAs," Raytheon Research Division, Lexington, MA.

July 1988, "Recent Developments in Low Temperature Si Epitaxy for High Speed Bipolar Applications," IBM East Fishkill, NY.

November 1988, "Recent Developments in Low Temperature Si Epitaxy," Delco Electronics, Kokomo, IN.

December 1988, "Recent Advances in Low Temperature Si Epitaxy by CVD," Texas Instruments, Dallas, TX.

April 1989, "Novel Device Fabrication and Processing," Industrial Liaison Symposium on Recent Advances in VLSI, MIT, Cambridge, MA.

May 1990, "Recent Developments in Low Temperature Si Epitaxy by CVD," North Carolina State University, NC.

August 1990, "Recent Developments in Low Temperature Si Epitaxy by CVD," NTT Musashino, NTT Atsugi, and Hitachi CRL, Japan.

June 1991, "Recent Advances in the CVD of Epitaxial Si: In-Situ Monitoring and Si-Ge," Fujitsu, NTT Atsugi, Toshiba, NEC, and Kanazawa University, Japan.

November, 1991, "New Developments in the CVD of Semiconductor Thin Films: Si-Ge and Real Time, In-Situ Monitoring," Columbia University, NY.

April, 1992, "New Developments in the Chemical Vapor Deposition of Semiconductor Thin Films: $\text{Si}_{1-x}\text{Ge}_x$ and In-Situ Real Time Monitoring," AT&T Bell Laboratories, Murray Hill, NJ.

May, 1992, "New Developments in the Chemical Vapor Deposition of Semiconductor Thin Films: $\text{Si}_{1-x}\text{Ge}_x$ and In-Situ, Real-Time Monitoring," Industrial Liaison Symposium on Electronic Materials: Synthesis and Control of Structure from Atoms to Devices, MIT, Cambridge, MA.

November, 1992, "In-Situ, Real-Time Monitoring of CVD Si Epitaxy," Sematech, Austin, TX.

December, 1992, "Si-Ge Heteroepitaxy by Very-Low-Pressure Chemical Vapor Deposition," Nippon-Sanso Ninth Annual Process Seminar, Semicon Japan, Chiba, Japan

March, 1993, "Overview of Microsystems Technology Laboratories," Motorola, Austin, TX.

March, 1993, "In-Situ, Real-Time Monitoring of Epitaxial Film Growth in a CVD Reactor," Texas Instruments, Dallas, TX.

January, 1994, "New Developments in the Chemical Vapor Deposition of Semiconductor Thin Films: Si-Ge and *In-situ*, Real-time Monitoring," Digital Equipment Corp., Hudson, MA.

September, 1994, "Overview of Microsystems Technology Laboratories", Motorola, Phoenix, AZ.

September, 1994: "Polycrystalline Silicon-Germanium for Thin Film Transistors", Motorola, Phoenix, AZ.

March, 1995: "Alternative Chemistries for Wafer Etching and PECVD Chamber Cleaning," Digital Equipment Corporation, Hudson, MA.

February, 1996: "Recent Advances at MIT's Microsystems Technology Laboratories," Rockwell, Newport Beach, CA.

March, 1996: "University Networks of Excellence: A New Component of the Research Infrastructure," Semiconductor Technology Council, Washington, DC.

April, 1996: "Advances in Microsystems Technology," Forum Comissionat per a Universitats i Recerca, Barcelona, Spain.

September, 1996: "Plasma Issues in new ERC on Environment, Safety and Health in Semiconductor Manufacturing," Tucson, AZ.

September, 1996: "Recent Advances at MIT's Microsystems Technology Laboratories", Lucent Technologies, Murray Hill, NJ.

January, 1997: "Made By Hong Kong: Electronics Sector," Hong Kong

January, 1997: "Environmental, Safety, and Health Issues in IC Manufacturing," ESH/ERC Videoconference Series, MIT, Cambridge, MA.

July, 1997: "Environmentally Benign Semiconductor Manufacturing," National University of Singapore, Singapore.

March, 1999: "Environmentally Benign Semiconductor Manufacturing," EECS Colloquium, MIT, Cambridge, MA.

June, 2000, "Plasma Etching Processes for the Reduction of Global Warming Emissions, and Monolithic Three Dimensional Integration in Microelectronics," Technion-Israel Institute of Technology, Haifa, Israel.

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